

SAFETY, HEALTH AND ENVIRONMENTAL PROGRAM



AUSTIN COMMERCIAL DALLAS, TEXAS

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AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 1 Program Overview
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Introduction

Throughout this project, Austin Commercial is serving as the Construction Manager. Each contractor shall retain the responsibility for providing a safe work environment for its own workers as well as for those workers of other employers who may be working near the contractor's operations. Nothing in this program makes the Owner or Austin Commercial, as the Construction Manager, responsible for injuries to any workers at the project. This program is intended to advise all contractors and their workers of the importance of providing a safe and healthy work environment and their obligations under the contract.

The mission of the Safety, Health & Environmental (SHE) Program is to develop, achieve and maintain an environment free of injury, illness and environmental impact. The total commitment and involvement of management, supervisors, individual employees, and contractors is necessary to accomplish this mission. Several processes and support systems will be implemented during the project to develop and maintain an Injury-Free Environment in which personnel will be full participants working toward the common goal of eliminating occupational illnesses and injuries.

Austin Commercial is committed to excellence in safety, health and environmental concerns and invites each person (client and contractor, management and craft personnel) to be dedicated and personally committed to achieving an incident-free project.

Nothing contained in this manual or in Austin Commercial's Safety, Health & Environmental (SHE) Program is intended to create or establish an employment relationship between Austin Commercial and employees of any Contractor. While Austin Commercial, as Construction Manager, reserves the right to deny any person access to the site, all decisions affecting the individual's terms or conditions of employment with his or her employer shall be the decisions of his or her employer.

Contractor's Responsibilities

Each contractor, as defined later, agrees that Austin Commercial has retained it for reasons, which include, but are not limited to, contractor's expertise with regard to safety and health hazards associated with the work to be performed by the contractor. Contractor agrees that it has and will have sole responsibility for the health, safety, and welfare of its employees, subcontractors, and agents performing work at the construction site. At all times while performing work at the construction site, the contractor, its employees, subcontractors and agents will also comply with all applicable Austin Commercial safety, health, and environmental procedures, policies, and guidelines. The contractor has the authority and responsibility to control, and/or correct all hazards associated with the work to be performed by the contractor. If the contractor becomes aware of a hazard which the contractor contends was created or caused by another entity, the contractor must notify Austin Commercial immediately in the case of an imminent hazard, and no later than two (2) working days in all other cases. If the contractor fails to do so, contractor agrees to assume all responsibility to control and/or correct the hazard as if the contractor were the creator or cause of the hazard.

The contractor will provide only properly trained and qualified personnel to perform work at the construction site. The contractor will provide only employees who are trained in both general safe work practices and all applicable specific hazards of the work to be performed. The contractor has the authority and responsibility to train the contractor's employees with regard to general and work-specific hazards and safe practices. The contractor shall certify in writing that all of their employees, subcontractors and vendors have been fully informed of tasks and specific hazards and safety requirements before beginning work on-site.

Section 1 Program Overview

01 SHE Program

Definitions

Austin – refers to Austin Commercial, Inc.
Construction Manager – refers to Austin Commercial, Inc.
Construction Site – refers to –

Contractor or Employer – refers to any company, business, or employer that will be performing work or hiring employees or other contractors that will be performing work at the construction site. It is intended that the term "contractor" includes general contractors, subcontractors, and specialty contractors.

Employee – refers to any worker who will be working at the construction site. It is intended that every individual who works at the construction site shall remain an "employee" of the contractor or subcontractor responsible for bringing the individual to the construction site.

Owner – refers	to –

Safety Leadership Team – refers to a committee comprised of Austin Commercial and contractor supervision that meets on a regular basis to review the status of safety, health, and environmental issues.

SHE – stands for "Safety, Health, and Environmental."

The following titles will be used to refer to members of Austin Commercial's management team:

Austin Project Manager – Austin Commercial's employee responsible for the overall project.

Austin Superintendent – Austin Commercial's employee responsible for field operations.

SHE Manager – Austin Commercial's employee responsible for overall management of SHE program.

The following titles will be used to refer to members of a contractor's management team:

Project Manager or Superintendent – refers to a Contractor's highest management representative who will be at the site on a daily basis.

Foreman or Supervisor– refers to a Contractor's employee who is directly supervising individuals working in the field at the construction site.

SHE Representative – refers to a Contractor's designated safety representative.

SHE Goals

In order to achieve the SHE goals, each contractor's management team must set the tone for safety early in the project. Without the active participation of all contractors and the commitment of each and every individual, these goals cannot be achieved.

The goals for this project are to:

- 1. Create and sustain an incident and hazard-free work environment.
- 2. Create and sustain a workplace free from substance abuse.
- 3. Create a Safety and Health conscious culture in Management, Field Supervision and all crafts.
- 4. Create and sustain a work environment free of hazardous and toxic spill/release.

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Communications

Austin Commercial will serve as the focal point for communications relating to the SHE Program. All correspondence, documentation, and information required by this program will be transmitted to Austin Commercial and will be maintained, forwarded or distributed as necessary.

Pre-Bid Conference

A pre-bid conference will be held for each bid package. The SHE staff of Austin Commercial will explain the SHE Program highlights, and will share the level of commitment that will be required by all contractors. During the pre-bid meeting, contractors will be given an opportunity to ask questions concerning the program, and are, therefore, encouraged to review this document in detail prior to the meeting.

Pre-Award Conference

Prior to the award of any contract, the firm will be asked to submit a safety plan for their scope of the work. The plan should include an overview of what steps the contractor will take to manage the hazards associated with the scope of work and a detailed description of the training program to be used for employees assigned to this project.

Pre-Construction Conference

Following the award of a contract and prior to mobilization, each contractor will attend a preconstruction conference where an in-depth review of the expectations of SHE performance will be conducted. During this meeting, contractors will be invited to participate in the Safety Leadership Team. (This may be mandatory for some of the larger contractors.)

Personal Protective Equipment (PPE)

The following PPE is required for personnel while working on or visiting the project site: :

- 1. ANSI Z89.1 Class B/C Head Protection
- 2. ANSI Z87.1 Safety glasses with fixed side shields (Prescription glasses must also meet ANSI Z87.1 unless worn in conjunction with safety glasses or goggles)
- 3. Ankle high, leather (or equivalent) footwear

Additional PPE may be required depending on the specific job hazards. The need for additional PPE shall be determined by the pre-task planning process, and will become mandatory when identified in this process. Some examples are listed below:

- 1. Reflective safety vests in work areas with mobile equipment
- 2. Protective gloves, including Kevlar glove liners under outer leather gloves, when handling sharp materials or equipment and when working in or handling sheet metal (i.e. ductwork, electrical boxes) and cutting tools.

Reusable PPE must be decontaminated prior to storage. Personnel required to use respiratory protection must be in compliance with OSHA 29 CFR 1910.134, Respiratory Protection standard. Personnel must be trained to select, use, clean and store all PPE properly.

Incident Reporting

Contractors shall notify Austin Commercial's SHE department (or other Austin Commercial contact) immediately (within one hour) of all incidents. Incidents include those that result in, or could have resulted in, an illness, injury, fire, property damage, or hazardous material spill while working on the project site.

In the case of an injury or occupational illness, a first report of injury document shall be forwarded to Austin Commercial within twenty-four (24) hours

Each contractor will be responsible for maintaining documentation and the reporting of incidents as required by federal, state, and local laws and regulations.

Incident Analysis

Each incident, occupational illness or occupational injury shall be formally documented and thoroughly analyzed by the contractor involved. The Root Cause Analysis shall be documented, with copies forwarded to the Austin Commercial SHE department within 24 hours of the incident.

At the discretion of Austin Commercial a joint analysis may be required. Therefore, when an incident occurs, the incident scene must be preserved and the parties involved, except for those who require medical treatment, will be retained to ensure a complete and thorough analysis. The decision as to whether a joint analysis is to be conducted will be made within one hour of initial notification.

Contractors shall report all first aid cases, OSHA recordable cases, restricted duty cases and lost workday cases, along with the total hours worked on the project (including field labor and office/general/support) to Austin Commercial SHE department each week.

New Contractor Orientation (NCO)

Contractors will be required to attend the NCO prior to beginning work on this project. Austin Commercial will conduct the NCO on-site. The NCO will consist of three (3) hours of site-specific awareness training. Below is a partial index of the NCO:

- · Hazard Communication
- Pre-Task Planning
- Review of Selected OSHA Requirements
- Site Specific Rules & Requirements

Orientations must be scheduled through the AUSTIN Superintendent or SHE Manager at least 48 hours in advance. At the time of the orientation, each worker must submit a signed and completed *Consent* form (Section 3-01, Attachment 1) and certification of the worker's drug-free status on his/her employer's letterhead.

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Explosives

Except where explicitly approved for use on the project by AUSTIN Superintendent, possession of any explosive is prohibited. Where explosives are required, the contractor shall closely control their storage and use. The contractor per the manufacturer's recommendations shall dispose of waste and defective explosives. Any employee found with explosives (not required by their work) in their possession will be permanently removed from the project site.

Firearms

The possession of firearms within the construction site is prohibited. Any employee found in possession of a firearm in the construction site will be immediately and permanently removed from the project site.

Restriction of Activities

Each contractor will designate and clearly identify an area within the construction site for employees to eat lunch and take breaks. Food and drinks (other than water or electrolyte-replenishing products, such as Gatorade) will not be allowed at any other part of the construction site. Each contractor will be responsible for maintaining its designated area in a clean and sanitary condition including the daily removal of trash and other debris.

Employees who fail to use the designated areas for food and drinks or who do not pick up and dispose of their trash will be subject to disciplinary actions as described in section 3-03. The first offense will be considered minor, however, repeated offenses could lead to removal from the site.

The construction site will be designated as a "No Tobacco" area except in those areas specifically identified and posted as tobacco use areas. (For the purpose of this program "tobacco" refers to any tobacco-containing product, including smokeless tobacco.) Any employee who breaks this rule will be subject to disciplinary action up to and including removal from the site.

Regulatory Compliance

Work performed on this site will be in conformance with local, state, and federal regulations. These regulations include but are not be limited to those promulgated and enforced by State health departments, Local, State and Federal environmental protection agencies, and the Occupational Safety and Health Administration. Any person who knowingly violates the regulations of any of these agencies having jurisdiction over the site, work place, or the work itself will be removed immediately from the project.

By reference, the applicable regulations of each of the local, state, and federal agencies that have jurisdiction over the project are made a part of the SHE Program. In instances where site policy exceeds a government regulation, the site policy will receive the same attention as the governmental regulations.

Return to Work Program

Each contractor should develop an alternative (light or limited) work program as its scope of work allows.

Communications/Information Distribution

SHE related information will be distributed to each contractor in the monthly Safety Leadership Team

meetings. The information distributed will relate to the safety, health, & environmental aspects of the project. Each contractor is responsible for distributing this information to its employees.

Medical Facilities and First aid

Medical Services

Austin Commercial will select a medical facility in close proximity to the project site for use by our employee owners. Contractors will be responsible for identifying the medical facility to be use by their employees unless there is a common insurance carrier (RCCIP, ROCIP, OCIP). On projects where a common insurance carrier is in place Austin Commercial will select and post the medical facility to be use in conjunction with the carrier.

Each contractor will be responsible for having individuals trained in first aid and CPR and maintaining adequate first aid supplies on site to treat its personnel.

If moving an injured person from the scene of the incident will aggravate the injury and he/she is not in an area of imminent hazard, the contractor shall summon an ambulance via 911 and render on-site emergency care until professional help arrives.

Hazardous Material Management

Purchasing

During the bidding and purchasing phase of the project, each individual and firm responsible for the purchase of materials shall research the products available and recommend those which have the least possibility of causing personal injury or environmental impact for use on the project site.

During the submittal process, materials that have a possibility of causing either personal injury or environmental impact shall be reviewed by Austin Commercial to verify the following.

- 1. Material Safety Data Sheets are included in the submittal.
- 2. Handling and storage instructions are clear and meet the methods and areas available.
- 3. Least impact materials have been selected and submitted.
- 4. Quantity required and schedule for delivery has been established.

Delivery

Each contractor shall submit the following to Austin Commercial at least 10 days prior to delivery of any hazardous materials or chemicals to the project.

- 1. List of hazardous materials or chemicals to be used on the project.
- 2. Total quantity of each material required for completion of the project.
- 3. Scheduled delivery dates for each material or chemical.
- 4. Material Safety Data Sheets for each material or chemical.
- 5. Special storage and handling instructions for each material or chemical.

Hazardous materials and chemicals shall be delivered in quantities to sustain field operations for no more than one-week, unless specifically approved in advance by Austin Commercial.

Storage

All hazardous materials must be properly stored. Each contractor will designate a hazardous material and chemical storage area at the project site. This area will be separated for flammable and non-flammable materials or chemicals. Additional segregation for materials or chemicals that might react to each other will be provided as necessary. The contractor is responsible for any required improvements (i.e., spill containment for liquid products, protection from the elements for outdoor storage areas, flammable cabinets for indoor storage, etc.).

Each contractor is responsible for unloading, placing in storage, and retrieval from storage any materials or chemicals that they have had delivered to the project. In addition, each contractor is responsible for the removal and recycling (where possible) of empty containers, and unused materials.

Handling and Use

Handling hazardous materials and chemicals will be done in strict accordance with the manufacturers' instructions. Each contractor shall keep the storage space and handling methods in mind when ordering materials for delivery.

Manual handling of bulk materials will not be allowed if mechanical means are available and meet the requirements of the manufacturer and space restrictions of the site.

Materials shall be used and/or applied as recommended by the manufacturer. Required personal protective equipment recommended by the Material Safety Data Sheet should be made available and used by personnel involved in handling and application.

Use of hazardous chemicals must be coordinated to prevent exposure to other trades.

Hazardous Waste

Empty or partially empty waste material containers shall be handled, stored, and disposed of in accordance with the project's hazardous material management plan. The purchasing firm is responsible for the proper disposal of hazardous waste in accordance with the local, state and federal laws. In no case shall these materials be disposed of on the site, through the industrial, sanitary or storm sewer systems.

Recycling of Solid Waste Materials

Each contractor working on the project will be required to look for opportunities for recycling waste materials from their operations.

Recycled materials shall include but not be limited to those listed below:

Dirt	Wood and wood products	Ferrous pipes, flashing
Brick and tile	Stumps, treetops, limbs	Steel and brass
Concrete, cinder block	Plaster and sheet rock	Aluminum
Asphalt	Glass	Copper

Contractor's Safety Plan

Each Contractor is responsible for maintaining an incident/hazard-free work environment. In compliance with Austin Commercial's SHE Program Manual, the Contractor shall comply with the

latest edition of this Site Safety, Health & Environmental Program and perform the following:

General Requirements

- 1. Within five (5) calendar days of notification of the contract award, submit in writing a Contractor's Safety Plan to the Austin Commercial Safety, Health & Environmental Manager who will review and make recommendations as needed. The Contractor's Safety Plan must comply with the Austin Commercial's Site Safety, Health & Environmental Program before the Austin Commercial Safety Health & Environmental Manager will accept the document. Construction will not begin without an accepted Safety Plan and Safety Representative on site. Delay in submitting a written Contractor's Safety Plan and acceptable appointee(s) for Safety Representative shall not constitute grounds for a contract schedule extension or delay claim.
- 2. The Contractor's Representative shall provide and maintain a chemical and flammable material storage area as described in this manual, Section 2-05, *Environmental Loss Control Practice*.
- 3. Each Contractor shall immediately notify the Austin Commercial Project Manager when a representative of OSHA or any other State, Federal, or local regulatory agency arrives on the project site. The Austin Commercial Project Manager will notify the appropriate contractors.
- 4. Be responsible for the control, availability, and use of necessary safety equipment, including personal protective equipment and apparel for the employees.
- 5. Maintain first aid kit/supplies and Bloodborne Pathogens kits, as scope of work requires.
- 6. Each Contractor shall also maintain their own orientation program for employees which shall include a review of the following as a minimum:
 - A. Hazards present in the area in which its employees will be working
 - B. The personal protective equipment, safety equipment and apparel the workers will be required to use or wear as specified by the Site Safety, Health & Environmental Program, and
 - C. Hazards presented by tools or equipment used by its employees.
- 7. Submit a list of qualified 'competent persons' in scaffold erection, excavation, confined space, fall protection, electric tool/cord inspection, and others as required by OSHA.
- 8. Submit a list of equipment operators that are qualified to operate equipment by the make and model of equipment. Maintain current file of certification of crane and fork lift operators. Maintain equipment inspection files, including annual crane inspection.
 - NOTE: Blanket or generic certifications of training will not be accepted. Operators must qualify on each specific make and model of scissor lift, aerial lift, fork truck or other equipment that they are expected to operate.

Contractor Safety Plan Requirements

The standard for construction on this project is an incident/hazard-free and spill/release-free environment. The Project SHE Program Manual has been developed to attain this goal.

The SHE Program Manual outlines the standards for work performed on this project. OSHA's standards for construction (29 CFR 1926) have been used as the starting point for the development of these standards. Austin Commercial recognizes OSHA standards as a minimum requirement and expects performance that exceeds these standards in several areas. Each contractor shall become familiar with the site requirements and pass the information to those

employees who will be assigned to the project.

Site Specific Rules

In addition to OSHA's standards for construction, each contractor must enforce the site specific rules in Attachment 2.

Required Submissions

Each contractor shall submit the following information for review by the Austin Commercial Project SHE Manager (Items 1-11 are mandatory for all contractors. Items 12-16 may not be applicable to the scopes of all contractors):

- 1. Written Safety, Health & Environmental Program
- 2. Job Hazard Analysis Program
- 3. Hazard Communication Program
- 4. PPE Program
- 5. Housekeeping Policy
- 6. Incident Analysis Program
- 7. Incident Emergency Procedures/Response Plan
- 8. Safety and Health Audit and Inspection Program
- 9. Resume of Safety Representatives (as required by contract)
- 10. Environmental Waste Minimization and Management Program
- 11. Drug and Alcohol Abuse Prevention Program
- 12. Respiratory Protection Program
- 13. Fall Protection Program
- 14. Confined Space Program
- 15. Energized Electrical Work
- 16. Lock-out/Tag-out Program

Other Requirements for Contractors

Contractors Safety Health and Environmental Representative

Each contractor will be required to furnish a Safety Health and Environmental representative. The duties are described in section 2-01 Accountability and Responsibility.

The individual selected to fill this position shall have the following qualifications:

- Five (5) years of construction experience.
- Three (3) years of safety experience (over 50% of time in safety).
- Successful completion of OSHA 10 Hour training (or OSHA 500 certified trainer).
- Four (4) hours of environmental training.

Training Requirements

Training Records

Each contractor is required to furnish certification (on their company letterhead) that their employees have been trained in the applicable sections of the OSHA standards and this program. Documentation of training shall be available for review by Austin Commercial upon request. Training documentation shall include date of training, outline of curriculum, length of class, and name of instructor or firm who provided training.

Minimum Training Requirements for Employees:

Contractor employees are expected to have the basic skills, education and training to perform their scope of work. In addition, each should have an understanding of the safety regulations that apply to their work. The following chart provides a list of safety training that may be required depending on scope of work.

Work Activity	Training
General	Hazard recognition, Hazard communication, Fall protection, First aid/CPR/Bloodborne pathogens (at least two employees), Hearing protection, Work control program (supervisors), Incident reporting, Requirements for job clean-up, Hand and power tool, Fire protection and prevention, Emergency action plan, Electrical safety (awareness), Lockout/tagout awareness, Ladder safety, Hazard reporting procedure
Pier Drilling	Swing barricade protection, Rigging, Hot work procedures, Respirators
Underground Utilities	Excavation and trenching, Laser usage, Swing barricade protection, Rigging, Hot work procedures, Respirators
Carpenters	Excavation and trenching, Scaffold usage, Laser usage, Powder-actuated tools, Scissors lift operation, Rigging, Hot work procedures, Aerial lift operations, Respirators
Concrete Placement &	Excavation and trenching, Scaffold usage, Laser usage, Powder-actuated tools, Scissors lift operation, Rigging, Hot work procedures, Aerial lift
Finishing	operations, Respirators,
Elevator	Scaffold usage, Confined spaces, Electrical safety (temporary electric), Lock-out/tag-out authorized person,
Drywall	Laser usage, Powder-actuated tools, Scaffold usage, Scissors lift operation, Hot work procedures, Aerial lift operations, Respirators
Work Activity	Training
Electrical	Excavation and trenching, Electrical safety (qualified person), Confined
Fire Alarms	spaces, Lock-out/tag-out procedures authorized person, Scissors lift operation, Rigging, Aerial lift operation, Energized work procedure
Audio/visual	aparation, rugging, runar int aparation, Energized Work procedure
Equipment	Equipment specific training

Operators	
Laborers	Excavation and trenching, Scaffold usage, Confined spaces, Laser usage, Powder-actuated tools, Scissors lift operation, Rigging, Hot work procedures, Aerial lift operations, Respirators
Masonry & Plasterers	Scaffold usage, Laser usage, Scissors lift operation, Rigging, Aerial lift operations, respirators
Millwork	Scaffold usage, Respirators
Plumbers Fire Sprinkler	Excavation and trenching, Scaffold usage, Confined spaces, Lock-out/tag-out procedures authorized person, Scissors lift operation, Rigging, Hot work procedures, Aerial lift operations, Respirators,
Paint	Scaffold usage, Respirators
Work Activity	Training
Rebar	Excavation and trenching, Scaffold usage, Confined spaces, Rigging, Hot work procedures
Roofing	Hot work procedures
Waterproofing	
Glass	Scaffold usage, Scissor lift operation, Aerial lift operation
Iron Workers	Fall protection, Scaffold usage, Laser usage, Scissors lift operation, Rigging, Hot work procedures, Aerial lift operations, Respirators
Pre-cast Erectors	procedures, Aeriai ilit operations, Nespirators
Metal	
Miscellaneous	
Carpet	
Tile—Vinyl	Hot work procedures (vinyl)

Record Keeping and Documentation

Each contractor will be responsible for the record keeping, documentation and reporting required by the various government regulations as they apply to their scope of work. Records, documents and reports required, as a result of work on this project, shall be available to Austin Commercial for review.

The following is a partial list of records, documents and reports required on this project:

- OSHA Log of Occupational Injuries and Illnesses (OSHA 300)
- OSHA Training Records
- OSHA Citations and responses
- Material Safety Data Sheets (MSDS)
- Inventory of Hazardous Chemicals
- SARA filings

- Manifests for Transportation of Hazardous Waste
- · Jobsite Safety Meetings
- Incident Analysis File
- Jobsite Inspections, including documented closure
- Log of First Aid Cases

Noncompliance

If the Austin Commercial Project Team notes any noncompliance with these safety requirements, or is advised of such noncompliance by the Safety Committee, or by a governmental agency with the authority to enforce safety regulations, Austin Commercial shall perform the following:

- 1. Notify the Contractor of the noncompliance and of the corrective action required. This notice, when delivered to the Contractor or the Contractor's Representative at the site of the work, shall be deemed sufficient notice of the noncompliance to immediately implement corrective action.
- 2. Exercise the right to issue a suspend-work order stopping all or part of the work if the Contractor fails or refuses to take corrective action within the time specified. The order will remain in effect until satisfactory corrective action has been taken.
- 3. Deny any claim or request from the Contractor for equitable adjustment for additional time or money on any suspend-work order issued under these circumstances.
- 4. Require the removal from the Project Site of any employee or piece of equipment that is deemed to be unsafe. The Contractor's Superintendent, Representative, or other personnel shall be replaced by the Contractor at the direction of Austin Commercial for their nonperformance of his or her safety duties at no additional cost to Austin Commercial.

SHE Bulletins

SHE bulletins will be distributed to contractors when entering or leaving the site, or in the lunch area. These bulletins will be reserved for issues that we believe need to be placed in the hands of employees quickly. Issues could include the facts concerning an incident, a spill or information that could prevent future incidents on the site.

Regulatory Agency Activities

Austin Commercial shall be notified immediately when any regulatory agency (EPA, OSHA, etc.) arrives on the project site. Austin Commercial will notify those companies that need to be involved in a regulatory agency inspection or meeting.

Contractors are required to comply with state, federal, and local regulations that apply to the construction of the project. In the event of any regulatory agency inspection, Austin Commercial will be involved from a supervisory standpoint. However, the individual contractor will be responsible for any penalties, and or corrections required for their scope of work.

In the event that any contractor receives a citation from a local, state, or federal regulatory agency, the cited firm shall take immediate action to resolve the violation with the appropriate regulatory authority.

These actions include: paying any and all fines, penalties or other cost that is levied by the regulatory authority <u>and</u> reimbursing Austin Commercial for all directly related and documented costs expended

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to resolve the violation by Austin Commercial.

Contact Information

A contractor or its employees may contact Austin Commercial at any time to discuss this Program or address any concerns about safety at the project.

AUSTIN Project Manager, AUSTIN Superintendent, SHE Manager at the construction site, or Austin Commercial's Safety Director at 214-443-5764

Attachments

Attachment 1 Site Safety, Health & Environmental Program Commitment Statement Form

Attachment 2 Site Specific Rules

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	Attachment 1—Site Safety Program
	Commitment Statement

Commitment

to

Project

Site Safety, Health & Environmental Program

I hereby attest with my signature below that I have read and understand these basic safety rules, and I ensure that my Company's employees will abide by them.

Signature of Contractor's Corporate Officer	Date
Printed Name of above Signature	
Printed Title of Signatory	

Site Specific Rules

- Ladders Any employee working on a ladder who is exposed to a fall through a floor opening or off an elevated floor due to the proximity of the ladder to the floor opening or building's slab edge, shall be protected from falling by a motion stopping system or a personal fall arrest system.
- 2. Ladders Employees ascending or descending ladders shall not carry any materials or tools in their hand while climbing. Both hands must be free to all proper climbing of ladders. Tools and materials will be raised using ropes or other suitable means.
- 3. Scaffold Guardrails or Personal Fall Arrest Systems must be used protect Employees on scaffold wider than 45" and 6' -0 or more above the lower level. For scaffolds 45" or narrower, employees must be protected when exposed to a fall of four feet or more.
- 4. Equipment Operation Employees operating equipment, such as scissor lifts, aerial lifts, forklifts, etc., must receive training on the exact makes and models of equipment they will be using on site. Training on like or similar models will not be accepted. While operating a piece of equipment, operators must carry proof of training for that specific make and model of equipment on their person.
- 5. Electrical GFCI will be used on all corded electrical equipment and tools.
- 6. Electrical All electrical cords require inspection on a daily basis. If defects are found the cord will be removed from service until repairs can be made. Electrical tape <u>is not</u> an acceptable repair for electrical cords.
- Fall Protection Fall Protection is required for all workers exposed to a fall of six feet or more. No trade is exempt from this general requirement, not even steel or pre-cast erection.
- 8. Head Protection Hard hats meeting the ANSI Z89 standards will be worn at all time while in the construction site.
- 9. Eye Protection Safety Glasses with side shields meeting the ANSI Z87 standards will be worn at all time while in the construction area.

Purpose

To advise contractors and their employees of the expectations of Austin Commercial and the Owner for the work to be performed at the construction site. Austin Commercial expects that the line management for each contractor will be accountable for the safe execution of work and services under its direction. Austin Commercial expects individuals working at the construction site to follow safe work practices, safety policies, programs, procedures and rules, and safety regulations, such as those administered by the Occupational Safety and Health Administration. This document details these responsibilities and accountabilities.

Definitions

- <u>Safety</u> means all aspects of the recognition, evaluation and control of physical and health hazards to prevent incidents that may cause property damage, loss of productive hours, and/or personal injuries.
- **Property Damage** means damage to equipment and property owned by Owner, Austin Commercial, Contractor, or a third party, and damage to the environment in the broadest sense.
- <u>Injury</u> means physical and/or health effects, acute or chronic, from contact with or exposure to hazards in the workplace.
- <u>Safety and Health Program</u> means Austin Commercial's Processes, Support Systems, Policies, Procedures, and Practices, rules and regulations that comprise Austin Commercial's Safety, Health & Environmental Program.

Accountability and Responsibility

Austin Project Manager

Austin Project Manager is responsible for the implementation of and compliance with the SHE Program on the project. The responsibilities and accountabilities for the results are measured by such criteria as incident rates and worker compensation cost per man-hour. The following actions, as a minimum, will be taken to accomplish this:

- 1. Resolve questions, approve and/or recommend necessary expenditures to correct unsafe conditions.
- 2. Make regular job site tours to determine if safe work practices are being observed, and that unsafe conditions do not exist.
- 3. Actively participate and follow the programs.
- 4. Serve on the Safety Leadership Team.
- 5. Review safety inspection and incident reports to ensure that corrections are made as required ensuring compliance.
- 6. Conduct regular safety meetings with project supervisors to promote safety awareness and to ensure compliance with the SHE Program.
- 7. Interface with client/owner to review and resolve safety concerns on the project.

01 Accountability & Responsibility

Communicate with and involve Austin Commercial's Safety and Health department personnel in matters that concern Safety and Health at the project.

Austin Superintendent

Austin Superintendent is responsible for functions related to performing work safely, and is accountable for compliance with the SHE Program. The following actions, as a minimum, will be taken to accomplish this:

- Lead Pre-Construction conference.
- 2. Arrange for field representation at Pre-Bid and Pre-Award conferences.
- 3. Pre-plan work to prevent incidents.
- 4. Enforce safety rules and regulations evenly throughout the project.
- 5. Monitor activities of foreman and contractor supervisors for compliance with safety program.
- 6. Communicate with and involve Austin's Safety, Health and Environmental staff in safety, health and environmental matters at the project.
- 7. Conduct job-wide safety meetings.
- 8. Lead SIR (Safety Interaction Report) program.
- 9. Participate in Site Orientation.
- 10. Conduct meeting with foremen on safety responsibility.
- 11. Participate in Incident Analysis
- 12. Serve on the Safety Leadership Team
- 13. Attend all Department of Labor, Occupational Safety and Health Administration (DOL/OSHA) project site visits and inspections.
- 14. Notify immediately other Austin Staff, including Project Manager and Safety Health and Environmental Manager, of site visits by regulatory agencies.
- 15. Set a good example for personnel.

Safety, Health & Environmental (SHE) Manager

Austin's Project Safety Manager (and/or staff) will perform safety inspections of the contractors' work areas. These routine safety inspections will include workplace surveillance and interaction with personnel. The Safety Manager (and/or staff) will:

- 1. Attend the pre-construction meetings and review requirements with contractors.
- 2. Participate in joint incident analysis reports on incidents and injuries.
- 3. Investigate incidents and ensure that immediate corrective action is taken, if necessary.
- 4. Ensure that the contractors' employees are made aware of steps to be taken in the event of an incident.
- 5. Serve on the Safety Leadership Team.
- Take immediate action to correct unsafe practices or conditions when discovered.

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- Enforce at all times the use of required personal protective equipment.
- 8. Serve as a safety resource to Job Supervisors/Foremen.
- 9. File Safety Interaction Reports (SIRs).
- 10. Review reports/summaries of observed conditions or practices regarding safety issues and suggest corrective actions, when necessary.
- 11. Assist in the implementation of incident reporting and the preparation of incident analysis reports according to procedures.
- 12. Report injuries and incidents in a timely manner in accordance with federal and state laws, regulations and Austin Commercial's SHE Program policies.
- 13. Ensure that adequate first aid supplies are available at the work site and that personnel maintain current first aid/CPR cards.
- 14. Provide SHE staff to audit Contractors' safety programs.

Contractor's Supervisors/Foremen

The Contractor's Supervisor is an integral part of an effective safety program, and the amount of effort he/she put into incident prevention on their daily assignments often determines whether an incident/hazard-free work environment is established.

A Supervisor's responsibilities include the following:

- 1. Prepare a daily work plan to:
 - A. Instruct the personnel under his/her supervision in safe work practices and work methods at the time the employees are given work assignments.
 - B. Ensure that his/her employees have and use the proper personal protective equipment, safety equipment and suitable tools for the job.
 - C. Include continuous monitoring to ensure that no unsafe practices or conditions are allowed to exist on the job sites.
 - D. Modify work plan and convey changes if conditions warrant
- 2. Hold daily "Tool Box" safety training with work crews to:
 - A. Discuss any observed unsafe work conditions.
 - B. Review the incident experience of the crew and discuss corrective action to prevent future incidents.
 - C. Encourage safety suggestions from the employees and report their recommendations to the Safety Representative.
- 3. Develop a safety conscious and cooperative attitude toward safety among the contractor's staff and sub-tier contractors.
- 4. Correct and report immediately, to the Safety Representative/Job Superintendent, any unsafe conditions, and/or practices.
- 5. Ensure that each employee at the end of his or her shift has signed the Daily Report as to whether he or she has been injured or not. See Attachment 1—Daily Sign-In Sheet.
- 6. Conduct a complete analysis of every incident and take corrective action to prevent

recurrence.

- 7. Set an excellent safety example for personnel.
- 8. Ensure that prompt first aid is administered to an injured employee and/or transport to the designated clinic.
- 9. Report any illness or injury to SHE Representative and designated Austin contact immediately.

Contractor's Safety Health and Environmental Representative

The SHE representative is responsible for coordinating safety and health activities for the job to which he/she is assigned and should execute the following activities and duties.

- 1. Inspect work sites daily to ensure that:
 - A. Safety practices, both OSHA and site specific requirements, are enforced.
 - B. Employees and subcontractors have been briefed on the safety aspects of their job(s).
 - C. Equipment is maintained and operated safely.
 - D. Ensure that contractor's employees wear proper dress and safety equipment.
- 2. Any safety violation and/or hazardous condition observed should be brought to the attention of the Supervisor in charge for immediate correction.
- 3. Conduct and document safety inspections and audits as outlined in section 3-04 of this program.
- 4. Prepare orientation talks and/or conduct training to ensure that contractor's employees are familiar with work site hazards and safe work practices.
- 5. See that sub-tier contractors have been briefed on all Safety requirements and expectations before a specialty contractor's job is started, and that they follow all aspects of the SHE Program as the job progresses.
- 6. Immediately visit the site of any injury, incident, or near-miss involving contractor's employees or equipment. View evidence and note conditions, conduct interviews, take appropriate follow-up actions, and assist with the analysis.
- 7. In the event a contractor's employee is injured while working at the jobsite, take the actions, make the notifications, and complete the reporting forms as outlined in the injury reporting procedure requirements of the customer and this program.
- 8. See that job-specific Safety Procedures are prepared as required for all jobs involving safety risks (such as working cranes near power lines, hot work, etc.). See that all supervisors and workers involved understand and follow the procedures.
- Prepare and submit to Austin's SHE Manager, a weekly Safety and Health Report to cover the contractor's work on the project. These reports will include all first aid cases, OSHA recordable injuries, restricted duty injuries, lost time injuries, and manhours worked for the week and total for job to date.
- 10. Ensure that all incidents including near misses and vehicle accident/injuries are reported to the respective supervisors, superintendents and/or managers and Austin SHE department.
- 11. Regularly communicate with Austin Commercial's SHE managers assigned to the project.

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- 12. Immediately inform Austin Commercial's Safety and Health Manager of any OSHA job site visit. Accompany the OSHA Compliance Officer(s) throughout the visit and inspection—except when the OSHA Compliance Officer has requested privacy during a discussion with a worker.
- 13. Conduct Industrial Hygiene monitoring and maintain Industrial Hygiene records as required and necessary due to the job/project environment.

Safety Leadership Team

- Meet monthly to review SIR data and other safety indicators for the project, the continued efficacy of this program and any other SHE issues brought forth by team members.
- 2. Meet following any recordable injury to discuss the accident and possible corrective measures.

Safety, Health and Environmental Personnel Assignment

Safety, Health and Environmental Representatives should be reviewed and approved by Austin Commercial's Safety, Health and Environmental Manager.

Base Number of Safety, Health and Environmental Representatives (SHRs)

Each contractor will assign Safety and Health Representatives to the project according to the project site risk level. Location, environment and nature of the work activities should be assessed and reviewed with Austin Commercial's Safety, Health and Environmental Manager.

Under normal conditions, contractors will assign one (1) full-time, onsite Safety and Health Representative (SHR) for single construction contracts that employ between 25 and 100 employees, including subcontractors.

If the total number of employees, including subcontractors, is fewer than 25 employees, then the highest level of supervision on the job, Job Superintendent or General Foreman, will be designated Safety, Health and Environmental Representative for the project and assume any responsibilities associated with that title.

Additional SHRs

An additional SHR will be assigned to cover work on the project if the contractor has more than three (3) separate contracts or more than 100 employees. As soon as either condition is met, an additional Safety & Health Representative is required.

If the nature of the work, including sub-tier contractors, warrants an additional SHR, one may be appointed or designated after consultation and approval by Austin Commercial's SHE Manager.

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02

Emergency Action Plan

DAILY SIGN-IN SHEET

Company Date				
Superintendent				
Foreman				
Name	Start	End	Were You Injured Today?	
			Yes	No

AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 2 Processes
	02 Emergency Action Plan

Purpose

The objective of this procedure is to provide a plan of action that will protect life and property in the event of fire, explosion, bomb threat, chemical spill, inclement weather, or other emergency.

Definitions

<u>Critical Operation</u> means a task or machine that could cause damage or itself be damaged through stopping in mid-cycle, shutting down improperly, or remaining in operation unattended (i.e., a concrete pump in operation, a cutting torch in use, a tanker refilling a diesel tank, etc.).

Responsibility

Safety, Health & Environmental (SHE) Manager

- 1. Coordinate notification of all contractor field supervision on site in the event of an emergency.
- 2. Personally notify local, state, federal agencies, and emergency responders as appropriate.
- 3. Communicate with the owner and ACLP SHE Director.
- 4. Evaluate effectiveness of plan after any incident requiring evacuation and periodically as the project progresses. Make necessary revisions.

AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 2 Processes
	03 Safety Awareness Program

ACLP Construction Manager

- 1. Coordinate evacuation process.
- 2. Track head counts from contractor superintendents/foremen and relay to the SHE Manager.

Contractor's Superintendent/Foreman

- 3. Coordinate the timely training of all associates under their supervision.
- 4. Maintain at least two individuals assigned to the site that are trained in first aid and CPR to provide medical attention to injured employees until an ambulance arrives.
- 5. Coordinate the shutdown of all contractor controlled critical processes, and communicate status to Austin Commercial LP SHE Manager.
- 6. Conduct a cursory search of the work area to ensure complete evacuation.
- 7. Perform head counts of their employees upon reaching the assigned rally point. Relay the count to the ACLP Construction Manager.

Procedure

Commonalities exist between the procedures to be followed in all types of emergencies; steps that are the same for all emergencies are discussed below under the heading *General*. Additional steps for each type of emergency are listed in a corresponding section, *Fire, Bomb Threat, Chemical Release, Weather-Related Emergencies,* and *Post-Emergency Operations*.

General

Actions by person discovering the emergency:

- 8. Notify coworkers in the immediate area of the emergency situation
- 9. Retreat a safe distance from the hazard and contact a supervisory person, preferably from his/her company. This person will notify the Austin Commercial LP SHE Manager. While it may be human nature to attempt to alert everyone, notifying project management will ensure the most rapid and complete notification of everyone at the facility.
- 10. Proceed as described in Actions by all workers upon notification of an emergency.

Actions by the ACLP SHE Manager upon notification of an emergency:

- 11. Immediately assign an individual to begin notifying contractors of the emergency.
- 12. Personally contact the appropriate response agency.
- 13. Coordinate operations between the response agency and site personnel.
- 14. Communicate with other coordinators and periodically provide an update to the owner.

Actions by contractor superintendents/foremen upon notification of an emergency:

- 15. Calmly notify your employees and usher them to the designated meeting area.
- 16. Before leaving work area, conduct a cursory search for any workers who were not notified of the emergency or who are unable to exit without assistance.
- 17. Notify ACLP SHE Manager if an ambulance is needed.
- 18. Perform a head count and relay the results to the ACLP Superintendent, updating the count periodically if necessary.

Actions by all workers upon notification of an emergency:

- 19. Unless working at a critical process, stop whatever you are doing. If you are operating a critical process, and are not in immediate danger, follow the instructions of your supervisor Critical Process Coordinator. Never remain at your post if doing so places your life in jeopardy.
- 20. Calmly and orderly evacuate the building (or seek shelter) using one of the paths identified as an emergency evacuation route on the maps posted throughout the facility. Meet at the designated area for your company.
- 21. Once at the meeting point, report to your supervisor to be counted. Report any injuries sustained due to the emergency or evacuation to the supervisor at this time.
- 22. Do not leave the meeting area until released by your supervisor. Do not reenter the building (or exit the shelter) until notified that the emergency is over by your supervisor or the "all clear" signal is given.

Actions by ACLP Superintendent upon notification of an emergency:

- 23. Receive head counts and relay the results to the ACLP SHE Manager.
- 24. Assist the ACLP SHE Manager as needed.

Fire

Action by workers in response to a Fire:

25. Attempt to extinguish the fire only if properly trained and the fire is in the incipient stage.

- 26. Do not block open fire doors. They must be closed to prevent the movement of heat and smoke to other portions of the facility.
- 27. In exiting the facility, do not use the elevators. Always use the stairs.

Bomb Threat:

Experience shows that 95% of all written or telephoned threats are hoaxes; however, there is always a chance that a threat may be authentic. Appropriate action should be taken in each case to provide for the safety of people and property.

Actions by person discovering or receiving a bomb threat:

- 28. If a threatening note or letter is received, immediately call the Emergency Coordinator. Do not continue to handle the note or show it to others, since latent fingerprints may be identifiable. To prevent panic, do not discuss the matter with anyone except the Emergency Coordinator or company officials.
- 29. If a bomb threat is received by telephone, the person receiving the call should be calm and courteous. Listen and do not interrupt the caller. (Pay attention to accents, male/female, background noises, etc.). Record details of the call. Immediately notify someone nearby while trying to keep the caller on the line. The person notified should in turn contact their supervisor or the ACLP SHE Manager.

Actions by person discovering a bomb or suspicious object:

- 30. Under no circumstances should anyone attempt to search out, move or defuse a suspected bomb.
- 31. Retreat to a safe location and notify your supervisor or the ACLP SHE Manager.

Actions by ACLP SHE Manager upon notification of a bomb threat:

- 32. After a bomb threat is received or a potential bomb discovered, the decision to evacuate the facility will be made by the ACLP SHE Manager in conjunction with the highest-ranking member of the ACLP management team present.
- 33. Independent of the decision to evacuate, the police should be contacted immediately.

Chemical Spill:

In the event of a chemical spill or waste release, take the following actions:

Actions by person discovering a chemical spill or release:

- 34. Avoid breathing any vapors that may be produced or contacting the material. Retreat immediately to a safe area (usually uphill and upwind).
- 35. Immediately report the incident to your supervisor, who will then notify the ACLP SHE Manager.
- 36. Do not attempt to clean up the spill or stop its flow unless so trained and authorized.
- 37. Do not flush the spill down any industrial, sanitary, or storm sewer system.

Actions by ACLP SHE Manager upon notification of a chemical spill or release:

- 38. The ACLP SHE Manager must decide whether a full, partial, or any evacuation is necessary based upon the material spilled and the amount.
- 39. If an evacuation is necessary, evaluate the safety of the normal designated meeting areas. If these must be changed communicate this to the contractors' supervision at the

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Safety Awareness Program

time of initial notification if possible.

- 40. If the spill is large or presents a hazard to employees or the environment the ACI SHE Manager will immediately call the local fire department or emergency response contractor.
- 41. If necessary, the ACLP SHE Manager will report the spill to the appropriate governmental environmental regulatory agencies.

Weather-Related Emergencies:

Unlike the other types of emergencies, the safest place in a weather-related emergency is indoors, usually in the center of the structure away from outside windows and doors.

In the event of a severe-weather emergency, the following actions should be taken:

- 42. The ACLP SHE Manager will decide if evacuation of work areas is necessary.
- 43. If evacuation is necessary, a safe place to congregate shall be selected by the ACLP SHE Manager.
- 44. The evacuation notice and meeting place will be announced over the radio. In the event of that workers are below grade, notification will be by word of mouth.

Post-Emergency Operations:

Workers shall not reenter the facility or leave the shelter for any reason until directed to by their supervisor.

The ACI Management Team will tour the facility and grounds to assess the extent of damage. After the tour, decisions will be made concerning temporary measures to protect the facility and its contents. A report of the emergency will be made to the ACLP Safety Director and the owner; they will advise regarding further action.

Training

All workers

The Emergency action plan will be communicated through New Contractor Orientation. Company specific details such as internal emergency call lists, rally points, and other information shall be communicated in site orientation conducted by each contractor. Workers must be kept abreast of any changes in their role in the emergency action plan and the use of emergency notification systems (i.e. pull-boxes, alarms, intercoms, radios and telephone lists).

ACLP and Contractor Supervision

Supervisory personnel will have further training on their specific roles in the plan as defined in the previous section.

Program Review

A critique will follow each evacuation incident. The effectiveness of this program will be gauged by the extent to which all contractors adhere to this procedure and the total time required to evacuate the work areas. Any changes to this program will be documented and maintained by the ACLP SHE Manager for the duration of the project.

AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 2 Processes
	03 Safety Awareness Program

Purpose

This program is intended to prevent incidents/accidents through the anticipation, recognition, evaluation, and control of hazards.

Requirement Overview

This program encourages the project management (Project Manager, Superintendent and their staffs) to become actively involved in the identification and correction of unsafe acts and the identification and recognition of safe acts in the construction environment. The program is not limited to management personnel, but can and should include craft worker involvement.

Responsibility

The Project Manager and Superintendent are responsible for implementing this program. They will identify the staff personnel who will be involved in the program. Each contractor will identify supervisors and craft personnel from its company to be involved in the program.

The Safety Observers responsibilities include Observing, noting and correcting any unsafe situation observed as follows:

- 1. All acts, situations, violations, etc., should be noted on a Safety Interaction Report (Attachment 1).
- 2. Interact with affected employee(s) to correct the issue immediately if possible.
- 3. Contact the appropriate supervisor to report any items that cannot be corrected immediately.
- 4. Turn in all Safety Interaction Reports at the end of the week to the Safety, Health & Environmental Manager for further evaluation and action, if any.

The Safety, Health and Environmental Manager will be responsible for the collection of information from the observation cards, production of a report showing the data each month, and dissemination of data to contractors.

Implementation

Safety Interaction Reports will be made available to all personnel participating in the program following an orientation of the proper methods for interaction with craft personnel and the use of the reports. Craft workers included in the program will be given orientation following their assignment to the program. Involvement in the program is not a full-time duty, the intent is to observe the actions of employees as normal work is being performed. When a problem is noted, interaction with the individual is required to get correction started.

Corrective Action and Feedback

Safety Observer

All observed hazards shall be corrected immediately by the Safety Observer. Hazards that cannot be corrected immediately shall be noted by the Safety Observer on the report card and

forwarded to the appropriate supervisor for further action.

Supervisors

Supervisors are responsible and accountable for implementing the necessary action to correct the items noted on the observation report as submitted by his/her employee and providing the feedback to Safety Observers of the status of their observed hazard.

Feedback

The items (hazards) noted on the completed forms and the corrective actions taken shall be covered by each supervisor with his/her crew during the next weekly safety meeting.

Training and Documentation

Managers, supervisors and crafts persons selected to serve as Safety Observers shall be given necessary training to perform their duties as Safety Observers.

Program

The training program shall include review of the following resources and specific information:

- 1. Austin's Safety Policy and Safety Interaction Program
- 2. Review of "Safety Survey" (see Section 3-04, Attachment 1)
- 3. Review of potential hazards in the work place
- 4. Hazard Recognition, with emphasis on the following general categories:
 - a) Personal Protective Equipment
 - b) Exposure to Hazards
 - c) Behavior/Acts
 - d) Physical Hazards

Scheduling

This training shall be conducted as a separate program and is expected to require approximately one (1) hour of class time.

Documentation

All training of employees shall be documented on class sign-in sheets at the time of training. Documentation shall be maintained on the project.

04 Pre-Task Planning

Safety Interaction Report

Date:	Т	Time:	
Observatio	n:		
Corrective	Action:		
	Cause: L/T	L/R L/B	_
Commitme	nt:		
	Further action of	or help needed?	
Observer:			
Company:			

04

Pre-Task Planning

Back of Card

L/T (lack of training)

- A. Employee did not understand Safety Procedures.
- B. Employee carrying out task for which he/she was not trained to do.
- C. Training was not frequent enough, employee has forgotten procedures.
- D. Employee received no job specific training.
- E. Employee following foreman's instructions.

L/R (lack of resources)

- A. Task was not planned correctly. Correct tool, equipment or P.P.E. was not available as a result.
- B. Equipment damaged or defective.
- C. Not enough people provided/available to carry out the task safely.

L/B (lack of belief)

- A. Employee did not believe he/she could get hurt.
- B. Employee had a bad attitude about safety
- C. Employee taking shortcuts.

The above list is typical of some, but not all, indirect causes for unsafe acts/conditions.

Complete all sections please.

AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 2 Processes
	04 Pre-Task Planning

Purpose

To eliminate incidents/accidents and business interruptions by utilizing and standardizing best known methods to recognize existing and potential hazards, enhance work crew coordination and communication and ensure all tasks are performed incident-free.

Scope

This section establishes minimum pre-task planning requirements for all tasks performed on this project.

Procedure

Foremen/supervisors must conduct pre-task planning prior to allowing any job to begin. The Supervisor's Work Plan form (Attachment 1), and the Job Hazard Analysis (JHA)/Tool Box safety training form (Attachment 2) will be used to document pre-task planning. Documentation of the plans must be made available at the job site.

NOTE: If jobs are repetitive in nature, pre-task plans from similar jobs may be referenced as a "beginning point" to complete plans for current jobs.

- 1. Identify the job steps. Mentally walk yourself "step-by-step" through the job from beginning to end, considering how a person might get hurt (the hazard).
- 2. Once potential hazards have been identified, put together a plan to reduce/eliminate each hazard (protective measures).
- 3. Communicate hazards of the job and protective measures to your workers (and to other groups which may be affected by your work).
- 4. After completing your work, ask workers for feedback and make notes on your pre-task plan about what could have been done better or safer and file it away for future reference.
- 5. Use the information from the JHA for Daily Toolbox Training.

Roles and Responsibilities

Austin Commercial will conduct periodic audits to ensure that the pre-task planning is conducted properly; periodically evaluate the program for effectiveness and continuous improvement opportunities; and update documents and/or process changes as needed.

Section 2 Processes

04
Pre-Task Planning
Attachment 1—Supervisor's Work Plan

SUPERVISOR'S WORK PLAN

Contractor Name: Date			Date:	
Supervisor:	Phone/Pager: _	hone/Pager:		
Location in Building:				
Work Description:				
Scope Hazard Analysis	<u> </u>			
BASIC STEPS	HAZ	ARDS	CONTROLS	
Tools, Equipment, Materials, Saf	ety Equipment, Per	sonal Protective Eq	uipment	
Systems Impact: Will any of the	• •	•		
Temporary Electrical Power _				
Permanent Electrical Power _				
Domestic Water	Yes No	Other	Yes No	
Permits:				
Hot Work: _	Yes No	Confined Space	YesNo	
Energized Electrical Work _	Yes No	Excavation	YesNo	
Review:		Austin Cor	mmercial Inc.	

AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 2 Processes
	04
	Pre-Task Planning
	Attachment 1—Supervisor's Work Plan
Comments:	

04 Pre-Task Planning Attachment 1—Supervisor's Work Plan

Instructions

Project Name: Enter the name of the project

Contractor Name: Enter the name of your firm

Date: Enter the date the form is being filled out

Supervisor: Enter your name

Phone/Pager: Enter the phone or pager number that you can be reached with

Location in building: Location where the work will be done in the building (example; first floor computer room)

Work Description: Describe the work you will be performing, this should be detailed enough to allow coordination with other trades work in the area. If your work will change during the period being covered use additional pages. This can be done for each day of the week or for no more than one week at a time.

Scope Hazard Analysis: Fill in an over view of hazards associated with the over all scope or work you included in the plan. This is not intended to be extremely detailed to the individual steps required by each crew. The detailed steps of each crew will be included in the "Task Hazard Analysis".

Tools, Equipment, Materials, Safety Equipment, Personal Protective Equipment: List the major item that you will need to do the work including special safety equipment.

Systems Impact: Check any lines that apply to the work being planned.

Permits: Mark any permits that will be required for the work planned.

Review: Austin Commercial Superintendent will review and sign in this space.

Comments: Austin Commercial will add any comments that they have in this space.

Project:

05

Environmental Loss Control Safe Practice

Date:

JOB HAZARD ANALYSIS/TOOL BOX SAFETY TRAINING

Crew:

Supervisor:		Task:	Task:		
Activities to Perform	Tools, Equipment Materials	Possible Injury	Controls, Plan		
Special Topic:					
MSDS:					
Crew Sign In					

AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 2 Processes
- Janoty, Houlding Environmental Frogram	0.5
	Environmental Loss Control Safe Practice

Purpose

This practice is intended to reduce or eliminate pollution and to be responsive to environmental regulations, public and owner concerns, and to prevent the losses associated with environmental contamination.

Scope

This practice covers the operations of all contractors on this project.

Responsibilities

All ACLP and contractor management personnel will ensure that the following measures and procedures are implemented to control potential and particular environmental hazards on this project.

General--EPA, OSHA, and State Regulations

Hazardous Waste Generator Number

Each state requires registration as a small industrial waste generator, depending on the quantities of hazardous waste generated per month. Check with local authorities to determine local requirements.

The EPA requires registration if operations generate hazardous wastes in quantities of 2,000 pounds per month or 10,000 pounds per year.

Waste Dump Sites

Each contractor is responsible for the waste it generates, and must ensure that all waste is properly disposed. Supervisors and employees must ensure that chemicals and empty chemical containers such as curing compounds, paints, thinners, form release oils, and concrete additives are not being sent to regular, municipal landfills unless the landfill operator is made aware of the material that is dumped. Waste hauler shipping manifests must be maintained for future reference and these records must be maintained for an indefinite period of time. For the duration of the project, these records must be available on site.

SARA Title III - Community Right To Know

Each contractor is responsible for its own SARA filings. Tier II Reports, if required, will be compiled and filed with the local (usually, State) authorities by March 1 of each year, and the local fire chief, as well as the disaster planning committee chairperson. These parties will be made aware of what hazardous materials and quantities of those materials are maintained on site.

Austin Commercial	02
Safety Health and Environmental Program	Processes
	07 OSHA Inspections

Employee Created Environmental Contamination (Non-job related activity)

Contractor employees should be encouraged at Tool Box safety meetings not to park personal vehicles in project parking lots if they have any type of fuel or chemical stored in the trunk or truck bed. Violation of this requirement could bring about disciplinary action. This measure will provide client and contractor protection from contamination arising from the use of unauthorized containers, unnecessary contamination not associated with the contract/project, and potential safety problems leading to injury.

Training

The requirements of the section will be communicated to all workers through their employer's project orientation (not the NCO).

Documentation

Employee training will be documented.

Review Date: January 2004

Austin Commercial Safety Health and Environmental Program	02 Processes
	07 OSHA Inspections

Purpose

This program is intended to allow employees an opportunity to report unsafe conditions or safety concerns, with out fear of retaliation.

Overview

This program will provide any employee on the project to report anonymously any condition that they feel is unsafe or unsanitary. Notification can be done by written notification, by phone or by contacting a member of the safety staff on the project or the safety director at the home office. All notification will be addressed by the safety department and the results will be shared with the crews either though tool box talks or job wide safety meetings.

Responsibility

The responsibility for managing this program rests with the site Safety Manager. The responsibility for reporting conditions will remain with the employees who observe them.

Implementation

During the project set up a direct phone line will be set up in the safety manager's office, which will be dedicated to safety reporting and will be answered by voice mail only. The number will be provided to all employees during the project orientation. Additionally, a suggestion box will be provided to allow written notification of unsafe conditions as well.

Once a concern is received the safety manager will investigate the issue, if found to be legitimate the issue will be taken to the field supervisor in charge for immediate correction. Following the corrective action, the Safety Manager will write a toolbox topic (or find one that addresses the topic) and distribute to all supervisors for inclusion in safety meetings.

If the condition is not found at the time of the investigation, it will remain on the "watch list" for at least 5 working days. During this period the safety staff will continue to look specifically for the subject noted in the voice mail. If the concern is not observed during the following 5 days a toolbox topic will be developed to address the concern and what the appropriate corrective action should be and distribute to all supervisor for use in their safety meetings.

Training

During the project orientation every effort will be made to encourage employee to openly advise supervisor and safety personnel of any conditions, which they feel are unsafe or unsanitary. However, in the event that they feel anonymous notification is needed the location of the suggestion box and the safety line phone number will be provided as well.

Documentation

The safety manager shall compile a log of all reported safety concerns and/or conditions reported by employees through the safety line, suggestion boxes or personal notification. Once corrective action has been completed and the toolbox topic distributed the log will be marked complete, and all backup documentation will be filed and maintained until completion of the project.

Austin Commercial Safety Health and Environmental Program	02 Processes
	07 OSHA Inspections

Purpose:

To set out the responsibilities for Austin personnel in the event of an OSHA visit to any of Austin's project sites.

Scope:

This procedure covers any and all visits by any personnel from OSHA both state and federal as they may apply to the location of the project. There are five (5) reasons that you may have OSHA show up on an Austin Commercial project. They are listed below;

- 1. Catastrophe Fatality or the hospitalization of three or more from a single incident.
- 2. Complaint Formal or informal complaint filed by an employee or the public in reference to a safety or health issue.
- 3. Referral By an OSHA compliance officer or other government employee
- 4. Scheduled Inspection Randomly selected projects from Dodge Reports
- 5. Blitz Similar to a referral where compliance officers drive around looking for a particular violation and stop to do an inspection.

Responsibilities:

Project Manager or Superintendent: Greet the compliance officer, review the photo identification and ask the reason of the visit. Explain that or company policy requires that our safety director be advised in the event of a visit from OSHA. Provide a location for the compliance officer to sit and offer them coffee or a soft drink. Call the safety director and or the safety manager responsible for the project.

Superintendent: Once the above has been performed, inform all contractors on site that there is a compliance officer on site and the reason for the visit. Assist the Safety Director or his designee in the opening conference and walk around.

Foremen: Proceed to the field and begin an inspection of the project to be sure that all hazards are corrected. Work with contractor's personnel to correct any possible hazards in their work environments.

Safety Manager: If on site, prepare the site by making a final inspection. If not on site report as soon as possible and assist site personnel in review of the site.

Safety Director: Respond to the site or designate a safety manager to respond to the site. Handle all communications with the compliance officer once on site.

Notify the President of the company and Regional Manager of the visit.

Review Date: January 2004

AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 3 Support Systems
	01 Drug and Alcohol Abuse Prevention

Procedure:

Austin Commercial's projects should be in compliance with the OSHA standards at all times. The inspections listed in the responsibilities are intended to fine tune the site by correcting any minor items that may have been overlooked or occurred since the last inspection.

The OSHA compliance officer has a job to do the same as Austin Commercial, be courteous at all times. The inspection will not begin until the Safety Director or his designee arrives on site unless the Safety Director directs otherwise.

In most instances the compliance officer will request an opening conference. All contractors who may be affected by the visit should attend this conference. In addition any union employees on site must have the opportunity to have their representative attend.

Following the opening conference the compliance officer will want to walk the site. This walk will be limited to the area defined in the opening conference, for a compliant or referral, the walk will be limited to the area where the violation is alleged to exist. The superintendent and safety director will accompany the compliance officer on this walk. It is important to duplicate any photographs, video, or notes that the compliance officer may take. The superintendent, safety director or other designated employee owner can do this. During the walk the superintendent or safety director should invite contractor representative to be present when the compliance officer is observing a work area or trade. If any violations are observed, correct them immediately. This correction may prevent a citation or could reduce the severity of the citation and/or penalty.

Note: In the event that the safety director is not on site, the superintendent or safety manager handling the walk should call the safety director if any change in the scope of the inspection should occur or if questions should arise during the inspection.

The compliance officer has the right to interview employees in private during the walk. It is Austin's policy that management personnel will not be interviewed in private. Management is defined as anyone from a foremen level up. If one of these employee owners is to be interviewed the safety director or our attorney must be present.

At the conclusion of the walk, the compliance officer will hold a closing conference. During this meeting the compliance officer will advise everyone of what has been observed, and the possible citations that could result. If the compliance officer does not request the closing conference the superintendent or safety director should request the closing.

Following the inspection, report the results to the company president regional manager, and safety director if not present.

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Purpose

Austin Commercial and the Owner seek to provide a safe, healthful and efficient work place for all individuals working at the construction site. Accordingly, the following Drug and Alcohol Abuse Prevention Program will be in effect at the site, and contractors will be expected to follow and implement this program.

Prohibited Acts

The distribution, use, sale, dispensing, possession or manufacture of alcohol, illegal drugs, or prohibited substances, the possession of drug paraphernalia, or the abuse of prescription drugs is absolutely prohibited at the construction site.

No one will be permitted on construction work sites, parking lots, in vehicles, or offices, who tests positive for the presence of illegal drugs, alcohol, or for legal drugs for which they do not have a current prescription.

Drug and Alcohol Screening

To ensure a drug- and alcohol-free workplace, individuals working at the construction site will be subject to the following drug and alcohol tests to be performed by an independent testing service. All tests, other than "Pre-access", will also include a 'breathalyzer' test for alcohol.

Pre-Access Testing

Prior to starting work at the site, all contractor employees and new applicants for employment will be required to pass a drug screen. Any employee or applicant who tests positive for controlled substances will not be allowed entry to the site for any purpose and for the duration of the project. Certification of a worker's drug-free status, on his/her employer's company letterhead, must be submitted at the time of orientation.

Post Injury and Incident Testing

All employees involved in an incident, which causes or could have caused personal injury, property damage, a fire, or a hazardous material spill or release, will be subject to post injury and incident drug and alcohol testing. The contractor is responsible for ensuring that the worker undergoes testing as soon as possible following an incident. Any employee who tests positive will not be allowed entry to the site for the duration of the project.

Random Testing

During the course of the construction activities on the project, periodic random drug testing will take place. The selection method will be random, with no consideration of employer, position, or previous testing.

Approximately 10 percent of all workers at the construction site will be selected for random screening every thirty days. Any individual who fails a random drug and alcohol screen will not be allowed entry to the site for the duration of the project.

01

Drug and Alcohol Abuse Prevention

'For Cause' Testing

Each contractor shall require each of its employees to undergo drug or alcohol testing if the Contractor has reasonable suspicion that an employee at the site may be under the influence of drugs or alcohol.

Any individual who fails a drug or alcohol test administered 'for cause' will not be allowed entry to the site for any purpose and for the duration of the project.

The Owner and the Construction Manager reserve the right to prevent an individual from entering the site if reasonable suspicion exists that the individual may be under the influence of alcohol or illegal drugs.

Random Test Procedures

An independent testing lab will be contracted for the project to administer all random drug and alcohol testing. All drug testing will be performed using a urine specimen. Alcohol test will be administered using a Breathalyzer.

A medical technician will prepare the chain of custody forms, split the sample, label both containers and then perform initial test using a rapid test kit. When the initial test is negative the individual will be allowed to return to the project.

When the initial test is positive, the second half of the specimen will be forwarded to a certified testing laboratory for GC/MS testing. Until the confirmation test results are received the individual will not be allowed access to the work site.

In the event of a positive confirmation test, the medical review officer will contact the individual to confirm the results. At this time the individual will be given an opportunity to present any prescriptions that might account for the positive results.

Following the contact with the individual, the medical technician will contact the employer and advise their "authorized individual" of the results. Project security will be advised of positive test results from a 'random', 'post injury / incident', or 'for cause' test.

The substance testing service will maintain confidential files of all drug and alcohol test results. Additionally they will maintain a database of the names all persons who are tested, the date of the test and the result of the tests.

Results

Results of drug and alcohol tests are considered extremely confidential. A confirmed positive result will result in the individual not being allowed to enter the construction site. Nothing in this policy is intended to affect an individual's employment relationship with his or her employer. Instead, Austin Commercial and the Owner seek to have a construction site that is safe, healthful, and efficient.

Access will be denied for anyone who tests positive on a pre-access test. Anyone who tests positive on a 'random', 'post injury/incident' or 'for cause' test will have their site access credentials removed by project security.

Only authorized persons will know of the results and they are responsible for keeping it confidential, except as required to take disciplinary action.

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	01 Drug and Alcohol Abuse Prevention

Challenge of test results

At the discretion of the individual's employer (the contractor), a confirming test will be offered. This test must be performed on the remaining portion of the original sample. If an individual does not request a confirming test, the individual will not be allowed to enter the site. If the individual or his employer requests a confirming test and while the results of the confirming test are pending, the individual's credentials authorizing entry to the construction site will be removed. If the confirming test is "negative," the individual will be allowed to reenter the construction site.

Cut-off limits for Drugs and Alcohol

The following limits will be used to determine a positive test result for each drug in the test panel.

Drug tested	initial	confirmation
Marijuana	50ng/ml	15ng/ml
Cocaine	300ng/ml	150ng/ml
Opiates	300ng/ml	300ng/ml
Amphetamines	1000ng/ml	500ng/ml
Phencyclidine	25mg/ml	25ng/ml
Alcohol	.04 by breath analyzer	

The limits listed above are subject to change by the Construction Manager or Owner at any time. A change in the limits will not affect an employee's previously signed consent to submit to substance abuse testing.

Medications That May Affect an Individual's Ability to Work Safely

Each contractor shall advise its employees that each employee at the job site is responsible for reporting any medication that will affect the employee's ability to work safely, to make safe decisions, or to perform essential job-related functions. (Austin Commercial is not seeking to acquire any information about a worker's medical condition or medical history.) If the contractor determines that the individual, due to the effect of the medication, poses an unreasonable health and safety risk, the contractor may reassign the employee to perform other duties until the effect of the medication has subsided.

Consent

As a part of this program, all individuals who will be working at the site must sign a consent-form agreeing to be tested according to this program. The consent form is attached hereto as Attachment 1. A completed and signed copy of this form must be submitted at the time of orientation (NCO).

Costs

Contractors will be responsible for paying for any testing required pursuant to this program. While Austin Commercial will coordinate monthly random drug tests, contractors will still be responsible for the cost of those tests.

Consent

Drug and/or Alcohol Testing Procedure

By signing below, I acknowledge that I understand that every worker who will be working at this construction project must be drug tested prior to the worker being allowed entry to the plant and/or work site. I understand that if I test "positive" at any time that I will be removed from and/or not be allowed entry to the site.

I understand that the distribution, use, sale, dispensing, possession or manufacture of alcohol, illegal drugs, or prohibited substances, the possession of drug paraphernalia, or the abuse of prescription drugs is absolutely prohibited at the construction site.

I further consent and agree to drug and/or alcohol testing in the following situations:

Pre-Access Testing

Prior to starting work at the site, I will be required to pass a drug screen

Post Accident and Incident Testing

If I am involved in an incident, which causes or could have caused personal injury, property damage, a fire, or a hazardous material spill or release, I will be subject to post-accident and/or incident drug and/or alcohol testing.

Random Testing

During the course of the construction activities on the project, I may be chosen for periodic random drug and/or alcohol testing.

'For Cause' Testing

If my employer has reasonable suspicion that I may be under the influence of alcohol or illegal drugs, I will be required to pass a drug and/or alcohol test.

I further understand and acknowledge that:

- My employer will pay the cost of all required drug and/or alcohol tests.
- My desire to work at the construction site is voluntary on my part and thus my consent to testing is also voluntary.
- I may request in writing, and receive without charge, a copy of the results of such testing.
- My employer is not Austin Commercial LP or Owner, and I am not an employee of Austin Commercial LP or Owner for any purpose under the law.
- The test results will be released to my employer, and my employer may use the tests in determining any adverse employment action that may be taken against me.

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	02
	Root Cause Analysis

- I have the right to refuse to submit to such testing; however, refusal by me to submit to, or to cooperate at any stage, in such testing shall be considered equivalent to a confirmed test "positive" and I will be removed from and/or not be allowed to enter the construction or plant site.
- Austin Commercial LP and Owner have made no representations, inducements, or statements, other than those in writing about the testing.
- With full knowledge of the foregoing, I hereby agree to submit to drug and/or alcohol testing conducted by the clinics and/or laboratories selected to administer the tests at the construction site. I further agree to release any and all claims that I may have now or might come to have in the future against Austin Commercial LP or Owner related to or arising from the drug and alcohol tests to be performed at the construction site.

PROJECT NAME	PROJECT OWNER	
SIGNATURE	PRINTED NAME	
DATE		

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Purpose

To implement a Root Cause Analysis (RCA) approach to incident analysis for all incidents and injuries which occur during work on projects, so that root causes can be determined and corrected to prevent similar future incidents and injuries. The fundamental basis of the RCA approach of placing the focus of post-incident/injury investigation on fact, not finding fault, will be followed. The results of RCA can be used to improve Job Hazard Analysis.

Scope

The Root Cause Analysis (RCA) system will be used for the analysis of all incidents and injuries that occur on the project.

Contractors are expected to participate fully throughout the RCA process and attend RCA process training.

Definitions

Accident means an unplanned event or sequence of events that result in a loss.

Cause means an event or condition that brings about an incident or accident.

Hazard means an existing condition or behavior in the workplace that could result in a loss.

Close-call/Near miss/Incident means an unplanned event, or sequence of events, with potential to result in a loss.

Loss means an incident that results in injury, death, property damage, negative public image, or loss of revenue.

Loss control means reducing or eliminating damage to or loss of any resource.

Multiple causes means two or more events, conditions or behaviors that by themselves, would not result in a loss, but when combined at the right time, create the right condition for an accident or incident.

Proximate cause means the failure event most closely related to, and causative of, a loss.

Root cause means the most basic reason(s) for an injury or incident, which if corrected will prevent a recurrence.

Responsibility

Supervisors

Contractor's supervisors, after an incident, are responsible for the following activities:

- 1. Attending to injured persons first.
- 2. Ensuring no secondary incidents occur (shutting down equipment, controlling spills, etc.).
- 3. Securing the area, as appropriate, to preserve evidence and determining what work is to be stopped and what can be continued.
- 4. Initiating the analysis immediately by noticing who and what are at the incident scene.
- Notification of Austin Commercial's SHE Manager or other ACLP contact.

- 6. Scheduling witness interviews, to be performed individually and as soon as possible while the information is fresh in people's minds.
- 7. Conditions permitting incidents should be re-enacted by the foreman, injured and witnesses.
- 8. The supervisor must look beyond the careless or unsafe act that may have been the proximate cause.
- 9. Practical, immediate actions should be taken to reduce the chance of recurrence.

Superintendents

Contractor's superintendents, after an incident analysis is completed, are responsible for the following activities:

- 1. Review of corrective actions recommended in the incident Root Cause Analysis report.
- 2. Ensuring that permanent actions are taken to prevent recurrence.
- 3. Elevating information to the level of management necessary to effect necessary changes.
- 4. Monitor effectiveness of corrective actions.

General

Injured

Tend to the injured first; however, no one should be placed at risk if hazards still remain. If the safety of the first responders if threatened, their continued well being must take precedence.

Security

Securing the area of the incident to prevent further injury or loss is secondary only to treating the injured. Once the hazard(s) have been controlled, no further changes should be made to the area until the investigative documentation has been completed for the Root Cause Analysis. Delay in securing the area and documenting conditions (whether by notes, photographs, videotape, etc.) may permit important evidence to be destroyed or removed. In outdoor situations, the weather and lighting level at the time of the incident should be noted.

Witnesses

Investigative analysis interviews with witnesses should be conducted as soon as possible. Witnesses should not be allowed to discuss the incident until after they have been interviewed. Delay and intervening discussions between witnesses may alter perceptions and dull recollection.

Causative Elements

There are five major sources (or elements) of incident causes. The Root Cause Analysis will establish the cause(s) of the incident as falling in one or more of these categories:

Manpower

Management, contractors, employees, customers, visitors, suppliers, the public, in other words, the human element. Manpower includes the people who:

- Establish company policies, procedures, practices, standards and related aspects of the "company culture".
- Design the workplace environment.

- Manage the preventive maintenance systems to keep tools, machines and equipment in good, safe working condition.
- Select, hire, terminate and place specific people in specific jobs.
- Orient, inform, instruct, motivate, guide, coach and lead employees.
- Perform the day-to-day tasks of operating or maintaining the machines, working with the materials, and performing other services, etc.

Materials

This element includes hand tools, consumable supplies, materials, chemicals and other substances that people use, work with and/or process.

Methods

This element includes the standards, practices, procedures, policies and so on that make up the safety, health and environmental management system.

Machines

This element includes all the power tools and machines that people work near and with. These items are a tremendous source of potential injury and death.

Environment

This element includes all parts of the surroundings: buildings, enclosures, equipment, materials, fluids, air, light, noise, heat, cold, etc.

Goals

The goals of Root Cause Analysis are:

- 1. Identify and locate the principle sources of incidents by determining, from actual experience, the materials, machines, and tools most frequently involved in accidents and the tasks most likely to produce injuries.
- 2. Disclose the nature, frequency and size of incident problems.
- 3. Disclose the unsafe practices, which necessitate training employees or changing work methods.
- 4. Enable supervisors to use the time available for safety work to the greatest advantage by providing them with information about the principle hazards and unsafe practices in the work location.
- 5. Permit an objective evaluation of the progress of a safety program by noting through continuing analysis the effect of the corrective actions, educational techniques, and other methods adopted to prevent incidents and injuries.

Procedure

Information to Be Collected

The following information is necessary to complete an RCA report. The answers to these questions should be included in the incident report form or in a narrative as part of the incident report.

Characteristics of the Person(s) Involved in the Incident

Department and occupation, time with employer, time performing occupation.

Narrative Description

What the person was doing? What objects or substances were involved? What actions or movements led to the incident? Events should be in sequence, beginning with the incident event and working backward through events that directly contributed to the incident. A description of any products or equipment involved with the incident and any other conditions (such as temperature, light, noise, weather, etc.) should be noted.

Equipment Characteristics

The description should include the type, brand, size, and any distinguishing features of the equipment, its condition, and the specific part involved.

Task Characteristics

The general task and specific activity (such as 'using a wrench'). The description should include the posture and location of the person involved (such as 'squatting under the pipe') and whether he/she was working alone or with others.

Time Factors

Record the time of the day and how it related to the shift the person involved was working. Was it the first hour of a ten-hour shift, for example? What type of shift—day, swing, straight, rotating, etc?

Preventive Measures

What personal protective equipment was being worn, and did the person's apparel affect the accident sequence? What kind of training did the person have for the task being performed? Did standards or procedures exist for the task? Were they written? Were they followed? If not followed, how did what happened differ from what should have happened? Were all guards in place and in use? What was the nature of supervision at the time of the incident? What immediate corrective actions were taken to prevent recurrence?

Severity of the Incident

The nature of the injury, body parts affected, and the OSHA severity class. If the incident resulted in some permanent impairment, this should be noted.

Root Cause Analysis Report

Using the *Guide for Identifying Causal Factors and Corrective Actions* form (see Attachment 1) complete each column based on the facts of the incident. Forward the report to the Superintendent, and Austin's S.H.E. Manager.

Corrective Action—Control

Manpower

Managing the manpower element and the interactions of people with the other elements is a major means of effective control.

Materials

Proper selection of materials and substitution of safer materials is a means of control.

Methods

Reducing incidents with root causes in the methods area can be grouped into three major areas:

- Creating adequate programs.
- Ensuring program standards are written in understandable language and specific enough to be used.
- Enforcing compliance with standards.

Machines

Controlling this root cause of incidents can be affected by proper safety guarding of equipment, operator training and ergonomic design of the machines and process flow.

Environment

Control of the environmental factors includes ventilation, heating, and separation of persons from noise sources, radiant heat sources, etc.

Closing the Loop

The Root Cause Analysis process is not complete until the loop has been closed by implementation of the corrective actions recommended in the report. Tracking and documentation of the corrective actions are the final steps.

Training

Supervisors, who have not previously been trained, will be trained in Root Cause Analysis within the first month of presence on the project.

All members of incident investigation teams will be trained in Root Cause Analysis.

GUIDE for IDENTIFYING CAUSAL FACTORS and CORRECTIVE ACTIONS

YES/NO	Root Causes Causal Factors	Possible Corrective Actions	Recommended Corrective Action	Person Responsible	
	1.0 Was a Manpower element a contributing cause?				
	Review ead	ch question and if "yes", comp	lete each row, and proceed to the	next question.	
	1.1 Was there a failure by supervision to detect, anticipate, or report a hazardous condition?	Improve supervisor capability in hazard recognition/ verification and reporting procedures.			
	1.2 Was there a failure by supervision to detect or correct deviations from job procedures?	Review job safety analysis and job procedures. Increase supervisor monitoring. Correct deviations.			
	1.3 Did employee(s) not know that wearing specified PPE was required?	Review job procedures. Improve job instruction.			
	1.4 Did employee(s) not know how to use and maintain the PPE?	Improve job instruction. Review PPE training.			
	1.5 Did employee(s) not know the job procedure?	Determine why; Encourage all employees to report problems with an established procedure to supervision. Review job procedure and modify if necessary. Counsel or discipline employees. Provide closer supervision.			
	1.6 Did employee(s) deviate from the known procedure?	Review employee requirements for the job. Improve employee selection and training.			
	1.7 Was employee(s) not mentally and physically not capable of performing the job?	Review employee requirements for the job. Improve employee selection. Remove or transfer employees who are temporarily, either mentally or physically, incapable of performing the job.			

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	Violation of Safety
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COMN	MENTS ON MANPO	OWER ELEMENT	

YES/NO	Root Causes Causal Factors	Possible Corrective Actions	Recommended Corrective Action	Person Responsible
	2.0 Were MATERIA	ALS, or lack of, a contributing fa	ictor?	
	Review ea	ach question and if "yes", cor	nplete each row, and proceed	I to the next
	que	estion.	•	
	2.1 Was the wrong equipment – tool(s)/material used?	Specify correct equipment/tool(s)/ Material or job procedures		
	2.2 Was the correct equipment – tool(s)/material not readily available?	Provide correct equipment/tool(s)/material. Review purchasing specifications and procedures. Anticipate future requirements.		
	2.3 Was proper personal protective equipment (PPE) not specified for the task or job?	Review methods to specify PPE requirements. Review PPE assessment study see SP-039 – Section 7 page 24.		
	2.4 Was appropriate PPE not available?	Provide appropriate PPE. Review purchasing and distribution procedures.		
	2.5 Was the PPE not adequate?	Review PPE requirements. Check standards, specifications, and certification of the PPE.		
Į.		COMMENTS ON MATERIAL	LS ELEMENT	

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YES/NO	Root Causes Causal Factors	Possible Corrective Actions	Recommended Corrective Action	Person Responsible			
	3.0 Was a METHOD, or lack of a method, a contributing cause?						
	Review each question and if "yes", complete each row, and proceed to the neguestion.						
	3.1 Did the location/position of equipment/material/ employee contribute to a hazardous condition?	Perform job safety analysis. Change the location, position, or layout of the equipment. Change position of employee(s). Provide guardrails, barricades, barriers, warning lights, signs, or signals.					
	3.2 Was employee(s) not informed of the hazardous condition(s) and the job procedures for dealing with it as an interim measure?	Review job procedures for hazard avoidance. Review supervisory responsibility. Improve supervisor-employee communications. Take action to remove or minimize hazard.					
	3.3 Was employee(s) not supposed to be in the vicinity of the equipment/material? 3.4 Were there no written or known	Review job procedures and instruction. Provide guardrails, barricades, barriers, warning lights, signs, or signals. Perform job safety analysis and change job procedure.					
	procedures (rules) for this job? 3.5 Did job procedures not anticipate the factors that contributed to the accident?	Perform job safety analysis and change job procedures.					
	3.6 Were any tasks in the job procedure too difficult to perform (for example, excessive concentration or physical demands)?	Change job design and procedure.					
	3.7 Is the job structured to encourage or require deviation from job procedures?	Change job design and procedures.					

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YES/NO	Root Causes Causal Factors	Possible Corrective Actions	Recommended Corrective Action	Person Responsible
	3.8 Was the PPE, if necessary / allowed not properly used when the injury occurred?	Determine why and take appropriate action. Implement procedures to monitor and enforce use of PPE.		
	3.9 Was there no supervisor / employee review of hazards of job procedures?	Establish a procedure that requires a review of hazards and job procedures (preventive actions) for task performed infrequently.		
	3.10 Was supervisor not adequately trained to fulfill assigned responsibility in accident prevention?	Train supervisors in accident prevention fundamentals.		
	3.11 Was there a failure to initiate corrective action for known hazardous conditions that contributed to this accident?	Review management safety policy and level of risk acceptance. Establish priorities based on potential severity and probability of recurrence. Review procedure and responsibility to initiate and carry out corrective actions. Monitor progress.		
	3.12 List other causal factors in "Comment" Section.			

Section 3 **Support Systems**

03 **Violation of Safety** Policy & Rules

YES/NO	Root Causes Causal Factors	Possible Corrective Actions	Recommended Corrective Action	Person Responsible				
	4.0 Was a condit	4.0 Was a condition of a MACHINE (S) a contributing cause?						
	Review ea	ch question and if "yes", co	emplete each row, and proceed	to the next				
	4.1 Did any defect(s) in equipment/tool / materials contribute to hazardous conditions?	Review procedure for inspecting, reporting, maintaining, repairing, replacing, or recalling defective equipment/tool(s) or material used.						
	4.2 Did the design of the equipment/tool create employee stress or encourage employee error?	Review human factors engineering principles. Purchase equipment/tools that are ergonomically designed. Review purchasing procedures and specifications. Check out new equipment and job procedures involving new equipment before putting into service. Encourage employee to report potential hazardous conditions created by equipment design.						
	4.3 List other causal factors in "Comment"							
	Section.	COMMENTS ON MACHIN	NE ELEMENT	<u> </u>				

YES/NO	Root Causes	Possible	Recommended Corrective	Person
	Causal Factors	Corrective Actions	Action	Responsible

E 0 14/ E11/45					
	CONMENTAL element a contrib				
	ach question and if it applies	s, complete each, row an	d proceed to the		
	next question.				
5.1 Was the hazardous condition created by the location/position of equipment /material not visible to employee(s)?	Change lighting or layout to increase visibility of equipment. Provide guardrails, barricades, barriers, warning lights, signs, or signals, floor stripes, etc.				
5.2 Was there insufficient work space?	Review workspace requirements and modify as required.				
5.3 Were environmental conditions a contributing factor such as: poor or no illumination, high noise levels, air contaminants, low/high temperature extremes, poor ventilation, vibration, radiation? 5.4 List other causal factors in "Comment"	Monitor, or periodically check, environmental conditions as required. Check results against acceptable levels. Initiate action for those found unacceptable.				
Section	OMMENTS ON ENVIRONM	ENTAL ELEMENT			

AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 3 Support Systems
	03 Violation of Safety Policy & Rules

Purpose

Contractors are responsible for following the established rules for safety and conduct set forth in this Safety, Health & Environmental Program manual. Contractors who fail to work safely or fail to follow the safety rules shall be subject to contractual damages including removal from the project.

Introduction

Austin Commercial and the Owner expect that each and every contractor will require its employees to follow their own safety rules, to follow the safety practices outlined in the SHE program, and to abide by OSHA regulations. On the construction site, it is further expected that individuals who are observed working unsafely will be informed immediately of the unsafe work practice. If additional training is necessary, it is expected that each and every contractor will provide the training required for its employees to work safely. Austin Commercial's SHE staff is available to act as a training resource. In the event an employee has been trained to work safely and yet the employee continues unsafe work practices, it is expected that the contractor/employer will discipline the employee appropriately. In the event, Austin Commercial observes any individual working in an unsafe manner, it reserves the right to remove the individual from the work site. To ensure that individuals at the site are working safely, Austin Commercial expects that all contractors will inform Austin Commercial of any unsafe work activity.

Reporting System

Citations

The primary document to be used to report a continued unsafe work practice is the Citation. An example is attached hereto as Attachment 1. Austin Commercial will have copies of the citation available for use by contractors.

A copy of each citation shall be forwarded to Austin Commercial's SHE Manager.

A copy of each citation shall also be kept at the job site.

Who May Issue Citations

Austin Commercial's Project Manager; Superintendent; Safety, Health and Environmental Manager or their staff members may issue a citation to any employee working at the project site.

Each Contractor may issue citations to their employees only and will determine who within their organization will be given this authority. In no case will any contractor issue citations to an employee of another contractor.

Contractors

Contractors are responsible for performing their work in a safe and healthful manner in accordance with the site SHE program and OSHA standards. Those who do not are subject to removal from the project for repeated safety violations (see Attachments 1, 2, and 3).

AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 3 Support Systems
	03 Violation of Safety Policy & Rules

Removal From Site

Except in cases of flagrant unsafe behavior, removal from the site will be preceded by a "Removal Warning" letter. This letter will be sent from the ACI SHE Manager to the employer of the unsafe individual. A copy, signed by the contractor's Project Manager or Superintendent, must be returned within 24 hours to the Austin Commercial SHE Manager.

Safety, Health & Environmental Personnel

SHE personnel are responsible for monitoring the implementation of this section of the SHE Program. Whenever Austin Commercial Safety, Health and Environmental personnel visit a work area, they will review copies of any citations kept on file at the work area as part of the routine review process.

Failure to implement this section of the SHE Program will be noted and reported as any other non-compliance items in site review reports.

AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 3 Support Systems
	Discipline and Violation of Safety Policy & Rules Attachment 1—Safety Infraction Citation Form

SAFETY INFRACTION CITATION

DATE:		JOB #:		
NAME:				
COMPANY:				
DESCRIPTION OF INFRA	CTION:			
CLASSIFICATION:				
	Minor		Significant	
	Serious		Flagrant	
Issuing Authority				
Contractor's Signature				
	(Front	View of Form)		

Austin Commercial—Safety, Health & Environmental Program Issued: January 2002

AUSTIN COMMERCIAL	Section 3
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	Discipline and Violation of Safety
	Policy & Rules
	Attachment 1—Safety Infraction Citation Form

DEFINITIONS

MINOR INFRACTION—Relatively minor exposure to individual cited, without injury potential to others.

SIGNIFICANT INFRACTION—Exposure to individual cited which involves potential injury exposure to others.

SERIOUS INFRACTION—Safety violation that in the opinion of the issuing supervisor could result in serious injury or death to the individual cited and/or to other persons.

FLAGRANT INFRACTION—Willful or extremely careless exposure of the individual cited, and/or others, to potentially catastrophic injuries or death.

(Back View of Form)

Austin Commercial—Safety, Health & Environmental Program

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Issued: January 2002

Review Due: January 2004

Discipline and Violation of Safety
Policy & Rules
Attachment 2—Severity of Infraction Table

SEVERITY OF INFRACTION Guide to Removal From the Site

	Severity of Infraction				
	Minor	Significant	Serious	Flagrant	
Definition	Relatively inconsequential exposure of self to minor injury or hazard	Consequential exposure of self and/or others to injury hazard	High level of exposure of self and/or others to injury hazard.	Willful or extremely careless exposure of self and/or others to potentially catastrophic hazard	
Example	Not wearing hard hat			Drunk on job	
First Offense			Letter to Employer	Removal	
Second Offense		Letter to Employer	Removal		
Third Offense	Letter to Employer	Removal			
Fourth Offense	Removal				

NOTES:

- 1. Citations will be recognized only for a period of one year from the date of the latest citation.
- 2. The severity of the infraction is based upon the judgment of Austin Commercial's management and supervision and may not exactly follow the above guidelines or any other predetermined industry standards.

AUSTIN COMMERCIAL	Section 3
Safety, Health & Environmental Program	Support Systems
	03
	Discipline and Violation of Safety
	Policy & Rules
	Attachment 3—Disciplinary Report Form

Removal Warning

To: Contractor or Specialty Contractor

Austin Commercial is providing you with this warning that your employee identified below will be removed from the construction site if the employee is identified working in an unsafe manner and/or in violation of this project's safety rules.

NAME:	
DEPARTMENT:	
DATE:	

AUSTIN COMMERCIAL Safety, Health & Environmental Pro	Section 3 Ogram Support Systems
	04 Worksite Inspections by Project Personnel
REMARKS: (Set forth all facts in det	ail)
	Austin Commercial SHE Manager
I have read this report:	
;	Signature of Contractor or

Purpose

This program ensures that the work site will be given a Safety, Heath & Environmental inspection on a regular basis.

Definitions

<u>Safety Inspection</u> is the process of reviewing a project site or work area, and comparing the site area to the OSHA standards and the project policy manual. Although the major focus will be on conditions, unsafe behavior observed during the inspection will be addressed as well. The *Safety Survey* (Attachment 1) is provided as a guide for these inspections.

Responsibilities

Austin Commercial

The SHE Manager shall schedule and participate in the SHE staff safety surveys.

The Project Manager will schedule and participate in weekly surveys by the management staff.

Contractors

Each contractor shall have its SHE representative document at least one safety survey of the area(s) in which the contractor is working each week. Contractors are encouraged to have their supervisory staff participate in the work site inspection program.

Inspection Process

Frequency

The SHE staff of Austin Commercial and each contractor shall inspect the work site on a daily basis. The inspection will be documented as required to ensure that any problems found are corrected in a timely manner. In addition each member of the SHE team (ACLP and Contractor) shall perform and document at least one, formal safety survey every week that they have personnel on site performing work.

Imminent Danger

If a situation that may present an immediate risk of an incident, injury or illness is found, work will be stopped immediately and will not resume until the situation has been corrected. No additional compensation or time extension will be granted as a result of such stoppage.

04

Worksite Inspections by Project Personnel

Reports

The *Safety Survey* form (Attachment 1) is available for documentation of the inspections. If the contractor has a similar form that they prefer to use it will be acceptable as long as the same general information is provided.

Austin Commercial's SHE manager will develop a leading indicator report based on the information collected on the safety inspections. This report will be completed on a monthly basis and reviewed at the Safety Leadership Team meetings.

Corrective Action—Follow-Up

All findings should be corrected as soon as possible. A follow-up inspection should be scheduled for auditing correction of reported items.

Each contractor will be required to have a tracking system to ensure that items discovered, that were not immediately correctable by the inspector, are assigned to a responsible person for corrective action.

All items not immediately corrected should be given a date for completion of corrective action. These items should be closed within the given time period.

Documentation

A copy of each completed *Safety Survey* with correction dates shall be maintained at the work site in a separate designated file.

Each documented safety survey will be copied and forwarded to the Austin Commercial SHE Manager on the last day of each workweek. Each item identified as not satisfactory, and not corrected immediately, will require an explanation and appropriate correction date.

Copies of the corrective documentation will be submitted to the Austin Commercial SHE Manager for record purposes

Tools and Equipment

Inspection

All tools, manual or power driven, and equipment mobile or stationary used in the execution of the work shall be inspected on a regular basis by the contractor's employees before using them. Electrical tools, extension cords, etc. shall be included in the inspections. Defects shall be reported for correction immediately.

Defective Tools & Equipment

Any tool or piece of equipment that is defective shall be tagged with a "Defective—Do Not Use" tag, and removed from service for repair.

Location:

a.

b.

C.

d.

e. f. Guardrail systems

Personal fall arrest system

Floor & wall openings

Safety nets

Warning lines

Other

05 Safety and Health Meetings

Safety Survey

Date:

		Satisfactory		Date Corrected	
	House Keeping	Yes	No		
a.	Appearance of the job neat & orderly				
b.	Regular disposal of waste & trash				
C.	Passageways & walkways clear				
d.	Projecting nails removed				
e.	Oil & grease removed				
f.	Proper toilet facilities				
g	Drinking water & cups				
	Power Tools & Hand Tools				
a.	Tools & cords in good condition				
b.	All mechanical safeguards in place				
C.	Right tool for the job at hand				
d.	Tool being used for its intended purpose				
e.	Eye, face & hearing protection use				
	Ladders				
a.	Properly secured to prevent movement				
b.	Side rails on ladders extended 3 feet above landing				
C.	Job built ladders meet ANSI standards				
d.	Step ladders being used properly				
	Fall Protection				

Safety Survey

			Satisfactory		Date Corrected
5		Scaffolding	Yes	No	
	a.	Erection under competent supervision			

05 Safety and Health Meetings

	b.	Scaffold grade lumber & proper overlap		
	C.	Safely tied to structure		
	d.	Guardrails & toe boards in place		
	e.	Proper access		
	f.	Frequent inspections		
	g.	Mechanical scaffolds operation		
	h.	Other		
6		Fire protection		
	a.	Number, location & accessibility of extinguishers		
	b.	Periodic inspection & maintenance		
	C.	Use of approved containers for flammable liquids		
	0.	The state of the s		
7		Excavations & Shoring		
	a.	Shoring of adjacent structures		
	b.	Banks sloped or shored		
	C.	Location of materials		
	d.	Barricades		
	е	Access provided within 25' of employees		
	f.	Frequent inspections		
8		Equipment		
	a.	Back-up alarms or flagmen		
	b.	Seat Belts in place and use		
	C.	Roll-over protection		
	d.	Fire Extinguisher		
	e.	Horn		
	f	Other		

Safety Survey

			Satisfa	ctory	Date Corrected
9		Hoist & Cranes	Yes	No	
	a.	Slings, hooks, shackles & eyes			
	b.	Outriggers used if available			
	C.	Barricade of swing radius			
	d.	Power lines minimum 10 feet clear			

05 Safety and Health Meetings

	e.	Other		
10		Personal Protection		
	a.	Hard hats meeting ANSI standards		
	b.	Eye protection meeting ANSI standards		
	C.	Respirator		
	d.	Gloves		
	ė.	Boots, shoes, toe guards		
	f.	Hearing protection		
11		Electrical		
	a.	Temporary power installation		
	b.	Temporary lighting installation		
	C.	GFCI available and used		
	d.	Extension cords in good condition		
	e.	Adequate task lighting		
	f.	Other		
12		Welding and Cutting		
	a.	P.P.E., clothing, equipment etc.		
	b.	Fire extinguisher		
	C.	Fire watch		
	d.	Storage of cylinders		
	e.	Torch inspection		
	f.	Housekeeping		

Safety Survey

			Satisfactory		Date Corrected
13		Stairways	Yes	No	
	a.	Permanent treads & landings			
	b.	Handrails installed			
	C.	Lighting			
	d.	Barricades			
	e.	Projections			
	f.	Housekeeping			

05 Safety and Health Meetings

14		Respiratory
	a.	Fitness test documentation
	b.	Training
	C.	Right respirator for the job
	d.	Storage
	e.	Cleaning and sanitizing
	f.	Hazard identification
	g.	Competent person on site
	h.	Inspections of equipment
	I.	Respirator log
	j.	Other
15		Aerial Lifts
	a.	Training documentation
	b.	Lift condition
	C.	Electrical system condition
	d.	Gas or LPG system condition
	e.	Guardrails and gates
	f.	Control operation test
	g.	Proper usage
	h.	Other

Safety Survey

			Satisf	actory	Date Corrected
16		Material handling	Yes	No	
	a.	Material stacked, racked, etc.			
	b.	Materials correct distance from slab edge/opening			
	C.	Non-compatible materials segregated			
	d.	Compressed gas cylinder storage			
	e.	Condition of rigging			
17		Powder Actuated Tools			
	a.	Training documentation			
	b.	Face shield or goggles			
	C.	Misfired cartridge disposal			

AUSTIN COMMERCIAL Safety, Health & Environmental Program

Section 3 Support Systems

05 Safety and Health Meetings

			ı		
	d.	Fired cartridge disposal			
		i nou can inage and pocan			
				•	•
Co	mm	ents:			
					

AUSTIN COMMERCIAL Safety, Health & Environmental Program	Section 3 Support Systems
	05 Safety and Health Meetings

Purpose

Scheduled safety and health meetings are vital for sharing information, providing instruction, obtaining feedback and maintaining employee interest. This program establishes the criteria for safety and health meetings.

Weekly Meeting

Contractor Supervisors/Foreman shall schedule a toolbox safety meeting with their crew at least once a week. The intent is to train/educate their employees on accident prevention methods, safe work practices and other specific safety topics. The weekly meetings, with prepared talks, shall be scheduled by each supervisor on a day and time that best meets the work schedule.

Topics for each weekly safety meeting shall be selected by the supervisor from such resources as:

- 1. Safety Awareness Reports or Observation Report cards.
- 2. Specific near misses, incidents or injury cases.
- 3. Typical hazard prevention methods related to the craft.
- 4. Job Safety Analysis Reports.
- 5. Results of walk-through inspections.
- 6. Results of any hazard notification from craft workers

Supervisors are expected to involve all employees, to the extent practical, in preparing and conducting the safety meeting. While responsibility for a portion of the meeting may be delegated to a subordinate, the supervisor must still attend and participate in each meeting. Questions and discussions should be encouraged.

The topic and attendance of each weekly meeting shall be documented by the supervisor. Records of all weekly safety meetings shall be maintained in a designated file at the job site.

Five Minute SHE Pre-Job Review

Supervisors shall schedule a Safety, Health & Environmental (SHE) pre-job review at the start of each shift with their crew to review the potential SHE hazards associated with their scheduled assignment for the shift and/or specific work activity during the shift.

Pre-job reviews should consist of completing a *Job Hazard Analysis/Tool Box Safety Training* form (Section 2-04, Attachment 2) for the work assignment as specified by a work order or as planned by the supervisor. The Pre-Task Review shall be conducted by the supervisor with participation by the crew members.

The completed form, as prepared and completed by each supervisor, shall be maintained in a designated file at the job site.

AUSTIN COMMERCIAL
Safety, Health & Environmental Program

Section 3
Support Systems

06 Training and Documentation

Mass Safety Meetings

ACLP Project Manager or ACLP Superintendent shall conduct a Mass Safety Meeting with all contractors and their employees at least every other week. When the total number of contractor employees at the job site is too high to render a single meeting effective, the workforce may be divided into manageable groups at the discretion of the Manager conducting the meeting(s).

Suggested safety and health topics include the following:

- 1. New Procedures/Practices
- 2. Incident/Injury Reports
- 3. Safety Statistics
- 4. Training Topics
- 5. Review and Discussion of Safety Observation Reports
- 6. Audit Walk-Through Inspections Reports
- 7. Results of any hazard notifications

The topic(s) of the meeting, person(s) presenting the information and persons in attendance for each meeting shall be documented and maintained in a designated file at the jobsite.

Special Safety & Health Meetings

Project Manager and SHE Manager at a project may schedule additional Special Safety & Health Meetings to communicate and address specific, priority safety and health topics with contractors and their subcontractors.

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	06 Training and Documentation

Policy

All contractors will conduct and document Safety, Health, Environmental, Quality, Craft and Supervisory Skill training to maintain and improve the safety, health and environmental awareness and skills of employees.

Documentation

Attendance and Completion

All training of employees (including supervisors), will be documented by employees signing an attendance record. Contractors may use Attachment 1 or another form that collects substantially similar information to document attendance. Copies of attendance records will be available at the jobsite for review by Austin Commercial's SHE Manager.

Verification/Validation

All training, including supervisory, shall be verified/validated to ensure that the participants understood the training. Verification and validation of the training can be by method of quizzes, written or oral tests, and/or work practice evaluation. Copies of the results of testing and the testing implement will be available for review by Austin's Commercial's SHE Manager.

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Safety, Health & Environmental Program

Section 1 Program Overview

O1 SHE Program Attachment 2—Site Safety Program Site Specific Rules

Attendance Record

Clas	ss name:	Date:	Hours	raugnt:	
Inst	ructor:	Test: Written	Oral	N/A	
	Employee Na	me		Company	
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25	·				

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This is a record of attendance and is not certification of information or knowledge gained by the employee(s) listed above.

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Purpose

Projects should have available on site those postings and notices that are required by Federal, State and local laws and those required by Austin Commercial's Safety, Health & Environmental (SHE) Program.

Required Postings

- 1. OSHA Job Safety and Health Notice
- 2. Minimum Wage
- 3. Family and Medical Leave Act
- 4. EEO Poster (Age Discrimination, ADA etc.)
- 5. Emergency Telephone Numbers
- 6. OSHA 300 Log—Posted during the months of February, March and April
- 7. Assured Grounding Poster—Usually posted in Tool Room
- 8. Hazard Communication and OSHA 1910.1020 Notice—Employee Rights
- 9. Appropriate Worker Compensation Laws Postings
- 10. Austin Commercial Safety Policy
- 11. OSHA Hearing Conservation Standard
- 12. Storm Water Pollution Prevention Plan
- 13. Designated Competent Persons, in each of the following areas, as appropriate for contractor's scope of work:

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- a) First Aid
- b) Respiratory Protection
- c) Electrical
- d) Ladders & Stairways
- e) Excavation
- f) Scaffolding
- g) Confined Space, Entry Supervisor
- h) Lead
- i) Asbestos

6/19/03

Additional Comments from NMCI PMO Facilities

Below is a list of additional comments on the Austin Commercial Safety, Health, and Environmental Program:

- 1. Required Submissions, Page 9, Section 1: The Draft Program proposes to have each subcontractor (i.e. electrical, mechanical, trenching, etc.) prepare separate required submissions for each project. This would result in multiple submissions for each project and would not yield a good overall site-specific coordinated plan. The Program should require one site-specific plan, prepared possibly by Austin Commercial, for each project.
- a. It should include the required submissions listed and should govern the work of all subcontractors for this project. Excavation Safety Program and Scaffold System Program should be included in the required submissions.
- b. Program document should identify the programmatic organizational structure with respect to safety and responsible individuals.
- c. The site-specific safety plan should identify the project organizational structure with respect to safety and responsible individuals who will be the on-site, responsible for assuring safety program rules enforcement and for the development of the site-specific safety plan.
- d. Include the name of designated competent person on each site for Excavation Confined Space entry, Scaffold Systems, Lock out tag out, fall protection etc.
- e. Also, the site-specific safety plan needs to be submitted to each ROICC before work at a particular site begins.
- 2. The final program document should be submitted by the prime contractor or designated party responsible for overall site safety in accordance with 29 CFR OSHA designated Multi Employer worksite responsibility for controlling and directing the work. Plan should be adopted through letter and signature of corporate representative for prime contractor as being

adopted by the prime contractor to cover all applicable operations including subcontractors.

- 3. Pre-Construction Conference- Section 1 Page 3 Please state that the ROICC will set up and lead the Pre-Construction Conference.
- 4. Incident Reporting Section 1 page 4; Add notification of ROICC representatives using same time line for incident notifications.
- 5. Explosives Section 1 page 5; change wording to state: Use of explosives is prohibited, unless specifically authorized in writing by the Contracting Officer and in compliance with USACE EM 385-1-1. All explosive devices must be under the supervision of NAVY Regional UXO personnel. Any UXO discovered / uncovered as a result of contractor operations must result in a stop work until the NAVY Regional UXO team can identify and dispose of the materials.
- 6. Medical Services Section 1 Page 6; The site specific safety plan submitted to the ROICC will identify the correct phone number for emergency services which should also be posted at each job site.
- 7. Crane use In order for crane access, contractors entering all Naval Facilities must comply with Navy requirements described below.
- a. Add the text of paragraphs 1.6.1.6; 1.8.1.e; 1.13.5; 1.13.6; and 3.6.2 a-t from NFGS 01525 dated 11/02 shown as follows (Note: Paragraph numbers in brackets do not need to be included.):
 - [1.6.1.6] Crane Operators: Crane operators shall meet the requirements in USACE EM 385-1-1, Appendix G.
 - [1.8.1.e.] Crane Critical Lift Plan: Prepare and sign weight handling critical lift plans for lifts over 75 percent of crane hoist's maximum load limit; lifts involving more than one crane or hoist; lifts of personnel; and technically difficult lifts involving non-routine rigging or operation, sensitive equipment, or unusual safety risks in accordance with USACE EM 385-1-1, paragraph 16.c.18. and submit 15 calendar days prior to on-site work.]
 - [1.13.5] Crane Reports: Submit crane inspection reports required in accordance with USACE EM 385-1-1, Appendix H and as specified herein

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with Daily Reports of Inspections.

[1.13.6] Certificate of Compliance: The Contractor shall provide a Certificate of Compliance for each crane entering an activity under this contract (see Contracting Officer for a blank certificate). Certificate shall state that the crane and rigging gear meet applicable OSHA regulations (with the Contractor citing which OSHA regulations are applicable, e.g., cranes used in construction, demolition, or maintenance shall comply with 29 CFR 1926 and USACE EM 385-1-1 section 16 and Appendix H. Certify on the Certificate of Compliance that the crane operator(s) is qualified and trained in the operation of the crane to be used. [For cranes at DOD activities in foreign countries, the Contractor shall certify that the crane and rigging gear conform to the appropriate host country safety standards.] The Contractor shall also certify that all of its crane operators working on the DOD activity have been trained in the proper use of all safety devices (e.g., anti-two block devices). These certifications shall be posted on the crane.

[3.6.2] Weight Handling Equipment:

- a. Cranes must be equipped with:
- (1) Load indicating devices (LIDs) and a boom angle or radius indicator,
 - (2) or load moment indicating devices (LMIs).
 - (3) Anti-two block prevention devices.
- (4) Boom hoist hydraulic relief valve, disconnect, or shutoff (stops hoist when boom reaches a predetermined high angle).
 - (5) Boom length indicator (for telescoping booms).
- (6) Device to prevent uncontrolled lowering of a telescoping hydraulic boom.
- (7) Device to prevent uncontrolled retraction of a telescoping hydraulic boom.]
- b. The Contractor shall notify the Contracting Officer 15 days in advance of any cranes entering the activity so that necessary quality assurance spot checks can be coordinated. Contractor's operator shall remain with the crane during the spot check.
- c. The Contractor shall comply with the crane manufacturer's specifications and limitations for erection and operation of cranes and hoists used in support of the work. Erection shall be performed under the supervision of a designated person (as defined in ASME B30.5). All testing shall be performed in accordance with the manufacturer's recommended procedures.
- d. The Contractor shall comply with ASME B30.5 for mobile and locomotive cranes, ASME B30.22 for articulating boom cranes and ASME B30.8 for floating cranes and floating derricks.
- e. The presence of Government personnel does not relieve the Contractor of an obligation to comply with all applicable safety regulations. The Government will investigate all complaints of unsafe or unhealthful working conditions received in writing from contractor employees, federal civilian employees, or military personnel.
- f. Each load shall be rigged/attached independently to the hook/master-link in such a fashion that the load cannot slide or otherwise become detached. Christmas-tree lifting (multiple rigged materials) is not allowed.
- g. Under no circumstance shall a Contractor make a lift at or above 90% of the cranes rated capacity in any configuration.
- h. When operating in the vicinity of overhead transmission lines, operators and riggers shall be alert to this special

hazard and shall follow the requirements of USACE EM 385-1-1 section 11 and ASME B30.5 or ASME B30.22 as applicable.

- i. Crane suspended personnel work platforms (baskets) shall not be used unless the Contractor proves that using any other access to the work location would provide a greater hazard to the workers or is impossible. Personnel shall not be lifted with a line hoist or friction crane.
- j. A fire extinguisher having a minimum rating of 10BC and a minimum nominal capacity of 5lb of extinguishing agent shall be available at all operator stations or crane cabs. Portable fire extinguishers shall be inspected, maintained, and recharged as specified in NFPA 10, Standard for Portable Fire Extinguishers.
- k. All employees shall be kept clear of loads about to be lifted and of suspended loads.
- 1. A weight handling equipment operator shall not leave his position at the controls while a load is suspended.
- m. Only Contractor crane operators who have met the requirements of 29 CFR 1910.94, 29 CFR 1910.120, 29 CFR 1926.65, 29 CFR 1926.500, USACE EM 385-1-1, ASME B30.5, and ASME B30.22 and other local and state requirements shall be authorized to operate the crane.
- n. The Contractor shall use cribbing when performing lifts on outriggers.
- o. The crane hook/block must be positioned directly over the load. Side loading of the crane is prohibited.
- p. A physical barricade must be positioned to prevent personnel from entering the counterweight swing (tail swing) area of the crane.
- q. A substantial and durable rating chart containing legible letters and figures shall be provided with each crane and securely mounted onto the crane cab in a location allowing easy reading by the operator while seated in the control station.
- r. Certification records which include the date of inspection, signature of the person performing the inspection, and the serial number or other identifier of the crane that was inspected shall always be available for review by Contracting Officer personnel.
- s. Written reports listing the load test procedures used along with any repairs or alterations performed on the crane shall be available for review by Contracting Officer personnel.
- t. The Contractor shall certify that all crane operators have been trained in proper use of all safety devices (e.g. anti-two block devices).
- b. Also, include the attached required checklist for crane and

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Certification of Compliance, which must be completed and posted in crane cab.

8. Section 2 Page 1 - Plan identifies Job Hazard analysis; Daily safety meetings, pre task planning, but Section 3 Page 1 says weekly safety meetings. Please clarify.

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CERTIFICATE OF COMPLIANCE				
This certificate shall be signed by an official of the company that provides cranes for any application under this contract. Post a completed certificate on each crane brought onto Navy property.				
PRIME CONTRACTOR /PHONE:	CONTRACT NUMBER:			
CRANE SUPPLIER/PHONE:	CRANE NUMBER:			
(if different from prime contractor) (i.e., ID number)				
CRANE MANUFACTURER/TYPE/CAPACITY:				
CRANE OPERATOR'S NAME(S):				
Certify that: The above noted crane conforms to applicable OSHA regulations (host country regulations for naval activities in foreign countries). The following regulations apply:				
 That the operators noted above have been trained and are qualified for tonoted crane. That the operators noted above have been trained not to bypass safety operations. 	-			
COMPANY OFFICIAL SIGNATURE:	DATE:			
COMPANY OFFICIAL NAME/TITLE:				

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POST ON CRANE

(IN CAB OR VEHICLE)

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<u>Crane/Derrick Requirements</u> <u>for all ROICC Construction Contracts</u>

US ARMY CORPS of ENGINEERS EM385-1-1 3 SEPT. 96 SECTION 16 MACHINERY AND MECHANIZED EQUIPMENT 16.C - CRANES AND DERRICKS - GENERAL

16.C.02 Every crane shall have the following documents with them at all times they are to be operated:

- a. A copy of the operating manual developed by the manufacturer for the specific make and model of crane; a copy of the operating manual for any crane operator aids with which the crane is equipped
- b. The load rating chart for the crane, which shall include:
 - (1) the crane make and model, serial number, and year of manufacturer;
 - (2) load ratings for all crane operating configurations, including optional equipment;
 - (3) wire rope type, size, and reeving; line pull, line speed, and drum capacity; and
 - (4) operating limits in windy or cold weather conditions.
- c. The crane's log book which shall be used to record operating hours and all crane inspections, tests, maintenance and repair. The log shall be updated daily as the crane is used and shall be signed by the operator and supervisor: service mechanics shall sign the log after conducting maintenance or repairs on the crane. Proof of performance testing must be in accordance with section 16.C.13.

16.C.05 Operator qualifications and training.

- a. Proficiency qualifications.
- (1) Each operator shall be instructed in and qualified for each type of crane or derrick he/she is to operate.
- (2) Qualification shall be by written (or oral) and practical operating examination unless the operator is licensed by a state or city licensing agency for the particular type of crane or derrick.

(Qualification for operation of a particular type of crane or derrick on a Corps project shall be valid for a period of three years.) **>See Appendix A**

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- (3) The qualifying examination procedures in Appendix G shall be followed. When the crane manufacturer recommends operator qualifying examination procedures, those procedures shall be in addition to the requirements of >Appendix G
 - b. Operators shall meet the physical qualifications listed in Appendix G: at the minimum, examinations are required annually.
- 16.C.07 Cranes and derricks shall be operated, inspected, tested and maintained in accordance with the manufacturer's operating manual for the crane.
- 16.C.08 A hazard analysis shall be developed and implemented for crane set-up and set-down procedures (Mobilization, assembly erection, dismantling, and demobilization).
- 16.C.12 Inspection of cranes and derricks shall be in accordance with the manufacturer's recommendations. Inspections shall be conducted by a qualified person and shall cover, at the minimum, the items listed in Appendix H.

Start-up Inspections to be completed before each shift and a copy submitted with the DRI.

Section 1

Section 1 Program Overview

01 SHE Program Attachment 2—Site Safety Program Site Specific Rules

START-UP INSPECTIONS for Cranes and Derricks

US ARMY CORPS of ENGINEERS EM385-1-1 3 SEPT. 96

(To be used on all ROICC Construction Projects)

Contract number Contractor					
Perso	Person making inspection Date		ate		
Crane	Make: Model:	Serial #:			
Inspec	<u>:t</u>		<u>Circl</u>	e One	
1.	All control mechanisms for maladjus operation	stment interfering with proper	Pass	Fail	N/A
2.	All control mechanisms for excessiv contamination by lubricants or other	• • • • • • • • • • • • • • • • • • •	Pass	Fail	N/A
3.	All operator aids, motion and load lindevices for malfunction and inaccura		Pass	Fail	N/A
4.	All cords and Lacing.		Pass	Fail	N/A
5.	All hydraulic and pneumatic systems those that flex in normal operation of		n to Pass	Fail	N/A
6.	Hooks and Latches for deformation,	chemical damage, cracks, and	wear. Pass	Fail	N/A
7.	Rope for proper spooling onto the dreeving for compliance with crane m		Pass	Fail	N/A
8.	Electrical apparatus for malfunctioni dirt, and moisture accumulation.	ng, signs of excessive deteriora	tion, Pass	Fail	N/A
9.	Hydraulic systems for proper oil leve	el.	Pass	Fail	N/A
10.	Tires for recommended inflation pre	ssure (mobile cranes).	Pass	Fail	N/A
11.	Wedges and supports for looseness cranes).	s or dislocation (climbing tower	Pass	Fail	N/A
12.	Braces and guys supporting crane r		ions Pass	Fail	N/A

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13. Derrick mast fittings and connections for compliance with manufacture's Pass Fail N/A recommendations.

14. Barge or pontoon ballast compartments for proper ballast; deckloads for Pass Fail N/A proper securing; chain lockers, storage, fuel compartments, and battening

<u>Periodic Inspection to be completed prior to initial use on ROICC Projects</u>
<u>Submit a copy with DRI</u>.

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Periodic Inspections for Cranes and Derricks

Cc	ontract Number	Contractor			
Pe	erson making inspection		1	Date	
	rane Make:	Model:	Se	rial	
<u>In</u>	<u>spect</u>				Circle One
1.	Foundation or supports for continued abi	lity to sustain imp	osed loads. Pa	ass Fa	iil N/A
2.	Braces supporting crane masts (towers) for connections for tightness or retention of climbing cranes for tightness and proper	preload; wedges	s and supports o		N/A
3.	Guys for proper tension.		Pass	Fail	N/A
4.	For derricks, inspect all cords and lacing, and derrick mast fittings and connection recommendations.		with manufacture		N/A
5.	Crane structure and boom and jib member of deformation, cracks, or corrosion.	ers, and their cor		osence Fail	N/A
6.	Bolts, rivets, nuts, and pins for tightnes	SS.	Pass	Fail	N/A

- Proper tension (torque) of high strength (traction) bolts used in connections and at the slewing bearing.
 Pass Fail N/A
- 8. Power plants for performance and compliance with safety requirements. Pass Fail N/A
- Electrical apparatus for proper functioning and absence of signs of excessive deterioration, dirt, and moisture accumulation.

 Pass Fail N/A
- 10. Hydraulic and pneumatic tanks, pumps, motors, valves, hoses, fittings, and tubing for proper functioning and absence of damage, leaks, and excessive wear; hydraulic and pneumatic systems for proper fluid/air levels. Pass Fail N/A
- 11. All control mechanisms for adjustment for proper operation, no excessive wear of components, and absence of contamination by lubricants or other foreign matter.
 Pass Fail N/A
- 12. Drive components such as pins, bearings, wheels, shafts, gears, sheaves, drums, rollers, locking and clamping devices, sprockets, drive chains or belts, bumpers, and stops for absence of wearing, cracks, corrosion, or distortion.
 Pass Fail N/A
- All crane function operating mechanisms for proper operation, proper adjustment, and the absence of unusual sounds.
 Pass Fail N/A
- Travel, steering, holding, braking and locking mechanisms for proper functioning and absence of excessive wear or damage.
 Pass Fail N/A
- 15. Tires for damage or excessive wear.

 Pass Fail N/A

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- Brake and clutch system parts, linings, pawls, and ratchets for absence of excessive wear.
 Pass Fail N/A
- 17. Wire rope. Visually inspect all running ropes, visually inspect all counterweight ropes and load trolley ropes, if provided. Visual inspections should concentrate on discovering gross damage, such as that listed below, which may be an immediate hazard: particular attention should be given to boom hoist ropes and sections of rope subject to rapid deterioration such as at flange points, crossover points, and repetitive pickup points on drums.
 - a. Distortion of rope such as kinking, crushing, unstranding, birdcaging,
 main strand displacement, core protrusion;
 Pass Fail N/A
 - b. general corrosion; Pass Fail N/A
 - c. number, distribution, and type of visible broken wires; Pass Fail N/A
 - d. broken or cut strands; Pass Fail N/A
 - e. core failure in rotation resistant ropes (care shall be taken when inspecting rotation resistant ropes because of their susceptibility to damage from misuse and potential for deterioration when used on equipment with limited design parameters).

 Pass Fail N/A
 - f. reduction of rope diameter below nominal diameter due to loss of core support, internal or external corrosion, or wear of outside wires. Pass Fail N/A
 - g. severely corroded or broken wires at end connections, severely corroded,
 cracked, bent, worn, or improperly applied end connections. Pass Fail N/A

Care shall be taken when inspecting rope sections subject to rapid deterioration, such as the following: sections in contact with saddles, equalizer sheaves, or other sheaves where rope travel is limited; sections of the rope at or near terminal ends where corroded or broken wires may protrude; sections subject to reverse bends; and sections of rope which are normally hidden during routine visual inspections, such as parts passing over outer sheaves.

- 18. Sheaves for the absence of cracks in the flanges and spokes. Pass Fail N/A
- 19. Rope for proper spooling onto drum(s) and sheave(s) and proper reeving. Pass Fail N/A
- Hooks and latches for absence of deterioration, chemical damage, cracks,
 and wear.

 Pass Fail N/A
- 21. Crane operator aids (safety devices) and indicating devices for proper operation. Pass Fail N/A
- 22. Motion limiting devices for proper operation with the crane unloaded (each motion should be inched into its limiting device to run in at slow speed with care exercised) and load limiting devices for proper operation and accuracy of settings.
 Pass Fail N/A
- 23. Load, boom angle, load or load moment indicating, wind, and other indicators for proper operation and accuracy's within the tolerances recommended by the manufacturer.Pass Fail N/A
- 24. Safety and function labels for legibility and replacement.

 Pass Fail N/A
- 25. For floating plant, inspect ballast compartments for proper ballast; deckloads for proper securing; safety of chain lockers, storage, fuel compartments; battening of hatches; hull void compartments

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sounded for leakage; tie-downs for barge-mounted land cranes for absence of wear, corrosion, and tightness; cleats, bitts, chocks, fenders, capstans, ladders, stanchions for absence of corrosion, wear, deterioration, and deformation; take four corner draft readings. Pass Fail N/A